

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

MARC VEASEY, *et al.*,

Plaintiffs,

v.

RICK PERRY, *et al.*,

Defendants.

Civil Action No. 2:13-cv-193 (NGR)
(Consolidated Action)

**THE TAYLOR PLAINTIFFS'¹ SUPPLEMENTAL BRIEF IN SUPPORT OF
THEIR APPLICATION FOR ATTORNEY'S FEES**

As this Court is acutely aware, the litigation over Texas' unconstitutional voter I.D. law has been long-running and complex. Such complicated and protracted litigation carries substantial costs and demands an enormous time commitment from the attorneys working the case. Those costs are often borne, as they are here, by nonprofit organizations with limited resources, whose budgets and staffing are strained by taking on long, complex constitutional litigation in support of fundamental rights. That is precisely why Congress provided for fee-shifting when meritorious suits give life to the Voting Rights Act and to the federal Constitution. Without fee-shifting, such rights would be all but impossible to vindicate through the courts.

The State Defendants ask the Court to undermine enforcement of the Voting Rights Act and fundamental constitutional rights by requiring the Taylor Plaintiffs' attorneys to self-fund much of this expensive litigation. Even though the Taylor Plaintiffs have *already* no-charged over 700 hours of work by its attorneys and paralegals,² discounting its attorney's fees by over \$600,000—nearly **40**

¹ Plaintiffs La Union del Pueblo Entero ("LUPE"), Lenard Taylor, Eulalio Mendez, Jr. Lionel Estrada, Estela Garcia Espinosa Maximina Martinez Lara (the "Taylor Plaintiffs").

² As mentioned in the Taylor Plaintiffs' fee application, they relied on the assistance of many TRLA staff attorneys (such as Peter McGraw, Priscilla Noriega, Kathryn Newell, and Kathryn Youker) and paralegals (such as Kathleen Griesbach),

percent of their billings—the State Defendants want this Court to slash their fee award by another \$354,910, effectively wiping out compensation for years of work. Resp., Dkt. 1196, at 93–94. Such an aggressive markdown is unwarranted and unreasonable.

The State Defendants divide their markdown requests into nine categories: (1) market rates, (2) travel time, (3) work on the fee application, (4) clerical, (5) duplicative, (6) excessive, (7) business development, (7) excessive, (8) a 20 percent across-the-board reduction, and (9) undocumented expenses. *Id.* The Taylor Plaintiffs’ reply addresses each separately in this brief’s subsections.

I. ARGUMENT

A. The Taylor Plaintiffs’ Requested Rates are Reasonable.

All of the arguments made by the Private Plaintiffs concerning the proper market rate for their counsel apply to counsel for the Taylor Plaintiffs: this case could not have been adequately litigated by counsel in Corpus Christi, precedent supports using 2018-19 rates, and the State Defendants’ proposed rates are illogical and misapplied. The Taylor Plaintiffs join the Private Plaintiffs’ reply on this issue, adopt their arguments concerning the appropriate rate of compensation, and ask the Court to award attorney’s fees to the Taylor Plaintiffs at the rates requested in their fee application.

B. Because the Taylor Plaintiffs Have Already No-Charged Over 60 Percent of Their Travel Time, Further Cuts Would be Excessive.

There are two major problems with the State Defendants’ position on travel time. Resp., Dkt. 1196, at 40–42. First, courts typically do not reduce either the number of hours or the hourly rate for travel time when an attorney spends that time working. *See Robinson v. Nexion Health at Terrell Inc.*, 3:12-CV-3853-L-BK, 2017 WL 5891790, at *3 (N.D. Tex. Nov. 1, 2017), *report and recommendation adopted*, 2017 WL 5714795 (N.D. Tex. Nov. 28, 2017) (declining to reduce the hours

who assisted with research, client outreach and other valuable services. In the exercise of billing judgment, the Taylor Plaintiffs are not requesting fees for any of these individuals’ work.

spent traveling to New Orleans for oral argument where counsel averred that he was reviewing briefs, making notes, and preparing his responses to questions during the trip). Here, many of the “travel” hours listed by the State Defendants are hours spent working. For example, on November 22, 2013, most of the 6.4 hours billed by Jose Garza was spent preparing for and meeting with one of Plaintiffs’ experts. *See* Resp. Ex. E-1, Dkt. 1196-32, at 3. On September 5, 2014, most of the 10.8 hours billed by Jose Garza was spent in trial. *Id.* The State Defendants misleadingly lump in hours spent working with hours spent traveling and ask the Court to discount all of those hours as travel time. That unjustified request should be discredited and denied.

Second and more importantly, although a district court may be within its discretion to reduce the number of hours or the rate—but not both³—awarded for travel, it is also within its discretion *not* to reduce travel hours or rate, especially when either has already been substantially reduced. *See Canaski v. MID Mississippi Properties, Inc.*, 1:15CV344-HSO-JCG, 2017 WL 4531690, at *6 (S.D. Miss. May 17, 2017) (declining to cut travel hours by 50 percent where the court had already “substantially reduced Plaintiffs’ compensation for travel”). Here, the Taylor Plaintiffs’ counsel have already done the Court’s work to reduce their travel billings by seeking compensation for **only 131.3 out of 343.3 hours spent on travel** by attorneys and staff. Moreover, by asking the Court to reduce *both* the number of hours by 50 percent *and* counsel’s rate by 35 to 45 percent, the State Defendants are seeking a much larger reduction in travel compensation than is typical in this circuit.

Had the Taylor Plaintiffs not already made deep cuts to their counsel’s travel hours in their fee application, a reduction in either the number of hours or the hourly rate (but not both) for travel time might be warranted. However, because they have **already no-charged 62 percent** of their travel hours, a full 50-percent reduction of the remaining hours—compounded by a 35 to 45 percent

³ In none of the State Defendants’ cited cases do courts cut *both* the number of hours billed for travel *and* the hourly rate during those hours—it is always one or the other. *See* Resp., Dkt. 1196, at 40–41 (citing cases). To cut both, as the State Defendants request, would be anomalous and excessive.

rate cut—would unfairly ignore the billing discretion already exercised. The Court should compensate the Taylor Plaintiffs for all of their travel time at each attorney’s typical reasonable rate.

C. Many of the Hours in Exhibit E-2 are Non-Clerical, and Even the Clerical Work Should Be Compensated, Albeit at a Lower Rate.

“There is no precise test for determining whether a task is legal or clerical.” *Malick v. NCO Fin. Services, Inc.*, CIV.A. H-14-1545, 2015 WL 4078037, at *5 n.4 (S.D. Tex. July 6, 2015).⁴ The State Defendants make no attempt to provide a fact-specific analysis of the Taylor Plaintiffs’ billing records; they simply list the billing entries in a table and summarily ask the Court to write off all of those hours. Resp., Dkt. 1196, at 44. To do so would be unjustified, not least because many of those hours are nonclerical. For example, Jose Garza’s billing entries are largely for legal work; to review correspondence, filings, notices, and transcripts for substantive and procedural legal issues involves the exercise of legal judgment and analysis. *See Tejero v. Portfolio Recovery Associates LLC*, AU-16-CV-767-SS, 2018 WL 1612856, at *5 (W.D. Tex. Apr. 2, 2018) (finding that “reviewing filings” was legal work, not clerical). Only the time spent organizing files (1.7 out of 8.5 hours) can be properly classified as clerical.

Likewise, although some of Marinda van Dalen’s Exhibit E-2 hours are properly classified as clerical, others are not. Time spent preparing materials for Mr. Jewell to review, preparing a schedule for discovery, reviewing documents, and preparing documents for production are legal work, since those tasks involve the application of legal judgment and analysis. *See Jimenez v. Paw-Paw’s Camper City, Inc.*, CIV.A. 00-1756, 2002 WL 257691, at *23 (E.D. La. Feb. 22, 2002) (finding that preparing for depositions and reviewing discovery constituted legal work, not clerical).

Moreover, even those hours properly classified as clerical should still be compensated, only

⁴ A task may be legal even if it is not complex, such as assisting with document production, preparing subpoenas, conducting factual investigation, and preparing correspondence. *See City of San Antonio, Texas v. Hotels.com, L.P.*, 5-06-CV-381-OLG, 2017 WL 1382553, at *6 (W.D. Tex. Apr. 17, 2017) (collecting cases). And work that is clerical in some contexts may be essential and reasonably recovered in a fee award in others. *See Depriest v. Walnut Grove Corr. Auth.*, 310CV00663CWRFBK, 2018 WL 1958285, at *2 (S.D. Miss. Apr. 25, 2018).

at a lower rate. Although some courts in this circuit will apply a blanket fee reduction—often 5 percent—to account for clerical work, other courts will apply a reasonable hourly rate for paralegal work to each item of clerical work. *See Saldivar v. Austin Indep. Sch. Dist.*, A-14-CA-00117-SS, 2016 WL 1064654, at *4 (W.D. Tex. Mar. 15, 2016), *aff'd*, 675 F. App'x 429 (5th Cir. 2017) (awarding \$125 per hour for clerical work based on reasonable rates for a paralegal in the San Antonio market in 2013–14). Given that the Taylor Plaintiffs' counsel's hours are already itemized, the Court should reduce the hourly rate for clerical work rather than apply a blanket reduction, which would result in an excessive markdown.

In brief, the Taylor Plaintiffs agree that some of the hours listed in the State Defendants' Exhibit E-2 are properly classified as clerical and should be compensated at a reasonable hourly rate for paralegals, which is \$125 an hour in the San Antonio market. Those hours constitute only 1.7 out of the 8.5 hours billed by Jose Garza and 11.8 out of the 17.3 hours billed by Marinda van Dalen. The remaining hours are legal work that should be billed at those attorney's typical reasonable rates. The Taylor Plaintiffs therefore urge the Court to award fees for their attorneys' Exhibit E-2 hours as follows:

- Jose Garza:
 - 1.7 hours at \$125/hour: \$212.50
 - 6.8 hours at \$613/hour: \$4,168.40
- Marinda van Dalen:
 - 11.8 hours at \$125/hour: \$1,475.00
 - 5.5 hours at \$544/hour: \$2,992.00
- **Exhibit E-2 subtotal: \$8,847.90**

D. None of the Taylor Plaintiffs' Requested Hours are Duplicative.

The State Defendants' request that the Court to cut 86.5 hours for being “duplicative” is unsupported. For one thing, their own Exhibit E-3 only identifies 70.4 hours of work, so it is unclear where (if anywhere) they came up with 86.5 hours. *Compare* Resp., Dkt. 1196, at 50, *with*

Resp. Ex. E-3, Dkt. 1196-34. More importantly, the hours alleged to be “duplicative” are simply not duplicative.⁵ Most of the billing records listed are for discussions with co-counsel such as Mr. Rosenberg and Ms. van Dalen. Those billing entries are not duplicative simply because they involved more than one lawyer. It is important to have case management discussions in multi-party litigation exactly to avoid duplication and to coordinate presentations. Other billing entries—such as Jose Garza’s 2.5- and 3.0-hour entries for trial preparation in August and September 2014—involve only one attorney and the State Defendants offer no explanation for labeling them “duplicative.” *See* Resp. Ex. E-3, Dkt. 1196-34, at 3. The Court should not cut facially reasonable billings when the State Defendants make no effort to explain how they might be duplicative. Finally, as noted above, the Taylor Plaintiffs’ fee application has already been reduced by over \$600,000 precisely because counsel exercised billing judgment to account for potential duplication. No further reduction for duplication should be made.

E. None of the Taylor Plaintiffs’ Requested Hours are Excessive.

Again without explanation, the State Defendants ask the Court to cut 46.5 hours as “excessive.” Resp., Dkt. 1196, at 53. Even a cursory review of these “excessive” billings shows their request to be baseless.

For example, one “excessive” billing is for Jose Garza’s work during the September 3, 2014, trial. Resp. Ex. E-3, Dkt. 1196-35, at 2. Mr. Garza, who took an active role in that trial, claims 9.0 hours worked during the trial and 3.3 hours before and after trial that day conferring with co-counsel and preparing. *Id.* According the State Defendants, the 9-hour billing for trial is excessive because the actual trial time was 8 hours and 11 minutes. Resp. Ex. F, Dkt. 1196-40, at 2. To correct for this alleged overcharge of 49 minutes, the State Defendants ask the Court to deny compensation for *the entire 12.3 hours*. Resp. Ex. E-3, Dkt. 1196-35, at 2. The Taylor Plaintiffs might not object to a

⁵ And, notably, the State Defendants make no effort to explain how they might be.

50-minute reduction for that billing entry, but there is no basis for denying compensation for 12.3 hours of trial work because of a dispute over 50 minutes. The State Defendants' list of so-called "excessive" billings is plagued by similarly misleading entries, such as:

- A 1.2-hour entry for work on a November 25, 2013, hearing. The entry includes time spent preparing for that hearing and conferring with co-counsel. The State Defendants allege that that hearing took only 51 minutes and therefore ask the Court to deny compensation for the full 1.2 hours.
- A 4.7 hour entry for work on a February 12, 2014, hearing. The entry includes time spent travelling and conferring with co-counsel. The entry explicitly allots only 1.2 hours to the hearing. Defendants allege that that hearing took only 46 minutes and therefore ask the Court to deny compensation for the full 4.7 hours.

Resp. Ex. E-3, Dkt. 1196-35, at 2; Resp. Ex. F, Dkt. 1196-40, at 2. The Court should not condone the State Defendants' overbroad attempt to deny compensation for reasonable work.

For billing entries not related to hearings, the State Defendants make no attempt to explain how they might be excessive. For example, they offer no basis for the Court to find that it was excessive for Mr. Garza to spend 6.5 hours researching, drafting, and editing a brief on January 13, 2014. Resp. Ex. E-3, Dkt. 1196-35, at 2. No mention is made of what the brief was or why Mr. Garza should have spent less time on it. *Id.* The Court should not take the State Defendants at their word for it, especially where the bases they have given for other entries are so nakedly overstated. And finally, again, the Taylor Plaintiffs have already discounted many hundreds of hours of work worth over half a million dollars. No reductions should be made for excessive billings.

F. A 20 Percent Across-the-Board Reduction is Completely Unjustified by 20.1 Hours of Allegedly Vague or Block-Billed Work.

The State Defendants complain that 20.1 hours' worth of billing entries are either vague or block-billed. Resp. Ex. E-6, Dkt. 1196-37; Resp. Ex. E-7, Dkt. 1196-38. Rather than seeking a reduction for only these 20.1 hours, the State Defendants ask the Court to reduce *all of the Taylor Plaintiffs' hours* by 20 percent, cutting the fee award by more than \$200,870. Resp., Dkt. 1196, at 57. This request is not made in good faith: they are asking for a 20-percent reduction to hundreds of

hours or work that *the State Defendants concede* is not vague or block-billed. The Taylor Plaintiffs do not object to cutting the 20.1 hours actually identified by the State Defendants as vague or block-billed. *See* Resp. Ex. E-6, Dkt. 1196-37; Resp. Ex. E-7, Dkt. 1196-38. But a 20-percent reduction to all of the Taylor Plaintiffs' hours, which they have already reduced by 40 percent through the use of billing discretion, is completely unjustified.

G. The Hours and Rate Requested for Work on the Fee Application Are Reasonable.

In the middle of their 100-page brief, State Defendants suggest with a straight face that the fee application in this case should not “result in a second major litigation” and that this fee application does not “involve complex legal issues.” Resp., Dkt. 1196, at 57 (quoting cases). Perhaps the naked hypocrisy of that position explains why they merely insinuate it without explanation. *Id.* at 57–59.

This litigation has spanned seven years, requiring a nine-day bench trial after vigorous pretrial litigation, a merits appeal to the Fifth Circuit, rehearing *en banc*, litigation over the proper relief on remand, and another appeal on the ultimate relief granted. This long, complex litigation has required over thousands of hours of work by the plaintiffs' counsel and their staff. To properly prepare a motion for attorney's fees at the end of that litigation, the plaintiffs' counsel had to review all of those thousands of hours of work to properly exercise billing discretion. On top of that, the State Defendants have opposed nearly every aspect of the plaintiffs' fee application. This fee application is complicated partly because of the nature of this case, and partly because of the State Defendants' own aggressive litigation of the fee application.

The State Defendants ask the Court to reduce Jose Garza's hours by 20 percent and his rate by 35 percent. Resp., Dkt. 1196, at 59. The result would be to cut compensation for his work on the plaintiffs' fee application by nearly 50 percent, down to \$13,472.00 from \$25,807.30. *Id.* Their only argument in favor of such a draconian markdown comes from a set of cases where courts awarded

an attorney 80 percent of his or her fee for hours worked on a fee application. *Id.* at 58. But those cases—none of which support a 50 percent reduction—do not support any degree of rate reduction in this case.

What the State Defendants omit from their brief is that the reason for cutting an attorney's rate on fee-application work is that often, a fee application is a straightforward task appropriate for a less experienced attorney. Right before the State Defendants' quote from *Leroy v. City of Houston*, 906 F.2d 1068 (5th Cir. 1990), that court explains that "hourly rates near the top of the scale" may be inappropriate if a task "could have been properly accomplished with greater overall cost efficiency by competent personnel whose lesser experience and skill would not justify such high rates." *Id.* at 1079. Nowhere does the Fifth Circuit say that rates for work on a fee application are reduceable *per se*; rather, an attorney's rate should be reduced only when the application can be completed by a less experienced attorney. *See id.*

That is not the case here. An experienced attorney was needed to scrutinize the billing entries for hundreds of hours of work by a large team of attorneys to ensure the appropriate exercise of billing discretion. An experienced attorney was needed to anticipate the prevailing-party and *Johnson*-factor issues raised by the State Defendants. Put another way: it is simply not credible for the State Defendants to file a 100-page response raising dozens of different legal challenges to the plaintiffs' fee application and then to claim that plaintiffs' counsel should be compensated at a reduced rate because the fee application is a simple motion that an inexperienced attorney could handle. Because it was reasonable for Jose Garza to prepare the Taylor Plaintiffs' fee application, rather than a less experienced attorney, it is reasonable to award him his customary rate, rather than to discount that rate by 20 percent (or by more, as the State Defendants request without justification).

H. The Taylor Plaintiffs’ Fee Request Does Not Include Time Spent on “Business Development.”

The State Defendants ask the Court to deny any compensation for over 30 hours of work they deem “business development” without analyzing those time entries at all. Resp., Dkt. 1196, at 65–67. Their Exhibit E-8 includes time that counsel spent meeting with people affected by SB 14—including actual clients—which constitutes fact investigation with potential witnesses. Resp. Ex. E-8, Dkt. 1196-39, at 1–5. That exhibit also includes time spent meeting with potential intervenors and obtaining evidence supporting the plaintiffs’ claims. *Id.*

The work listed in Exhibit E-8 was not expended to develop Texas RioGrande Legal Aid’s business—a concept that makes little sense for a legal aid provider.⁶ That work was done to develop the evidence in this case and advance the goals of the plaintiffs in this action. Time and effort spent interviewing clients and researching the facts of a case is “reasonably expended in litigation” not least because such careful fact investigation is ethically required. *See Webb v. Bd. of Educ. of Dyer County, Tenn.*, 471 U.S. 234, 250 (1985) (Brennan, J., concurring) (quoting *Hensley v. Eckerhart*, 461 U.S. 424, 433 (1983)). Indeed, federal courts have disregarded mischaracterizations of time as “business development” when it was clear that the attorneys were developing the facts of a claim through interviews with potential clients and witnesses. *See Bratcher v. United States*, 136 Fed. Cl. 786, 794 (2018), *reconsideration denied sub nom. Michael A. v. United States*, 137 Fed. Cl. 645 (2018). The work mischaracterized as “business development” in Exhibit E-8 should be compensated at each attorney’s typical reasonable rate given the actual substance of the work performed, with one exception: the Taylor Plaintiffs do not object to cutting 2.0 hours from Mr. Doggett’s billings based on the vague time entry listed in Exhibit E-8. Resp. Ex. E-8, Dkt. 1196-39, at 2.

⁶ TRLA represents low-income clients for free in civil cases. Each year, TRLA receives tens of thousands more requests for service than it has the capacity to accept. The notion that interviewing potential clients (who also happen to be potential fact witnesses) for this action somehow furthers the business of a nonprofit law firm that provides free legal services to the poor is nonsensical on its face.

I. The Taylor Plaintiffs' Requests for Expenses are Supported by Documentation.

The State Defendants ask the Court to deny them all of their expenses based on a lack of documentation. Resp., Dkt. 1196, at 72. The documentation attached as Exhibits B–G to this supplemental brief provides that documentation. Because the Taylor Plaintiffs agree that they will only seek to recover documented expenses, they have revised their claim for expenses downward slightly to **\$40,094.35**. *See* Taylor Supp. Exs. B–G.

As for the State Defendants' unsupported objection to expenses relating to client outreach and communication, that objection is baseless. 42 U.S.C. § 1988 permits the recovery of reasonable out-of-pocket expenses such as travel and telephone calls to clients. *See Gros v. New Orleans City*, CIV.A. 12-2322, 2014 WL 3894371, at *4 (E.D. La. Aug. 8, 2014) (“[A]ll reasonable, out-of-pocket expenses, including charges for photocopying, paralegal assistance, travel, and telephone, are recoverable in [S]ection 1988 fee awards because they are part of the costs normally charged to a fee-paying client.”) (citation omitted). As discussed above, travel to interview fact witnesses and clients is appropriately billed to a fee-paying client because such work is essential to ethically developing a claim for relief. As it would be reasonable to charge these travel expenses to fee-paying clients, it is appropriate to seek reimbursement of these expenses under Section 1988.

II. CONCLUSION

For the reasons given above and in the Taylor Plaintiffs' fee application and supporting briefing and exhibits, the Taylor Plaintiffs ask the Court to award them the following reasonable attorney's fees and expenses under the Voting Rights Act and Section 1988:

- Attorney's fees
 - Jose Garza: 460.7 hours at \$613/hr. = \$282,409.10
 - Jose Garza (clerical): 1.7 hours at \$125/hr. = \$212.50
 - Marinda van Dalen: 1138.8 hours at \$544/hr. = \$619,507.20
 - Marinda van Dalen (clerical): 11.8 hours at \$125/hr.: \$1,475.00
 - Robert Doggett: 143.6 hours at \$572/hr.: \$82,139.20
 - **Total attorney's fees: \$985,688.60**
- Expenses
 - Filing fee and process service fee: \$590.00
 - Expert expenses: \$31,442.72
 - Travel expenses for client outreach and communication: \$2,031.17
 - Travel expenses for depositions, ct. hearings and trial: \$5,855.46
 - Other trial expenses (interpreter): \$175.00
 - **Total expenses: \$40,094.35**

Respectfully submitted,

/s/ Jose Garza
JOSE GARZA
State Bar No. 07731950
ATTORNEY FOR TAYLOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that on February 7, 2020, I electronically served the foregoing via ECF on all other parties in this litigation.

/s/ Jose Garza
JOSE GARZA

TAYLOR EXHIBIT A
GARZA DECLARATION

**IN THE UNITED STATES DISTRICT COURT
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MARC VEASEY, *et al.*,

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Civil Action No. 2:13-cv-193 (NGR)
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Reply Declaration of Jose Garza

I, Jose Garza, submit this Reply Declaration, in accordance with 28 U.S.C. 1746.

1. In our original declarations Taylor counsel requested compensation for 1778.7 hours devoted to the case. See Dkt 1144 pp. 5-6. This requested represented a substantial reduction of hours, representing about 28% of the total requested. Thus, the Taylor Plaintiffs' fee application has already been reduced by over \$600,000 precisely because counsel has already exercised billing judgment to account for possible duplication, possible excessive billing etc. For instance, I requested compensation for 472.9 hours spent on the case, while writing off 317 hours in the exercise of billing judgment. (total hours devoted to the cause was 789.9, a reduction of over 40% of my time). In addition, as reflected in the original Motion, Taylor Plaintiffs' did not bill at all for time devoted to the case by several other lawyers and paralegals who assisted in the development of the evidence and records and exhibits. Defendants have proposed additional major reductions, summarized in their Memorandum, pages 93-94, and itemized in their Exhibits E-1 through E-8. I believe the vast majority of these hours are compensable. This Reply Declaration challenges the most clearly unjustifiable of Defendants' proposed cuts.

2. Based on our challenges of clearly unjustified cuts, which are spelled out below, and in our

supplemental brief, I believe the maximum justifiable cuts under Defendants' theories would result in a reasonable fee of **\$985,688.60** for the Taylor Plaintiffs. In addition, our requested reasonable rates of \$613.00/hour, \$544.00/hour and \$572.00/hr are reasonable and should form the basis of the lodestar in this case.

3. The cuts we challenge are in the following Defendants' categories: Travel (Def. Ex. E-1), Attorney's fees (Def. E-5); Clerical (Def. E-2), Duplicative (Def. Ex. E-3), Business Development (Def's Ex. E-8), Excessive (Def. Ex. E-4), Non-Compensable (Def. Exh. E-5), and Block-Vague Billing (Def. Ex. E-6 and E-7).

4. Travel, Def. Ex. E-1. Defendants propose to cut 131.3hrs from Taylor fee request representing travel hours. (26.8 of Doggett travel time; 59.7 of Garza travel time; and 44.8 hrs. of Van Dalen travel time). Yet, the exhibit clearly shows that not only the travel time documented but also other activity claimed in the noted time entries, such as meetings with experts and clients, reviewing discovery with clients, reviewing possible trial testimony etc. are also included in the proposed reductions. (See e.g. Def. E-1, p. 2 Jose Garza entries for 11-22-13 (meeting with experts), 2-6-14 (confer with expert regarding discovery material, prepare potential witness), 9-5-14 (trial). Moreover, the Taylor fee application has already reduced a substantial number of travel time by the no bill entries on their daily time record entries. By our calculations over 212 hours of the no bill entries on our initial fee application were for travel time. Since the Defendants failed to filter out non travel time in their requested reduction and since the Taylor Plaintiffs' fee application already has reduced 212 hours, no additional reduction for travel should be made.

5. Attorney's Fees. Defendants proposed cuts of hours (42.1) and rates is more fully addressed the brief in reply to Defendants' Response. It is important to note that many of the hours sought to be reduced on this issue involved a scrutiny of the time entries to reduce the hours claimed. See

Def's Exhibit E-5. There should be no reduction in the amount or rate of compensation for work on the fee application.

6. Clerical, Def. Ex. E-2. Defendants propose to cut 25.8 hours described as clerical. However, as with their argument on travel time reductions, the Defendants seek to reduce time entries that include more than potential clerical activities. For example the entries Defendants seek to eliminate include deposition preparation and reviewing trial transcripts in Jose Garza's entries. (See Def. Exh. E-2, p. 001. First, the Court should more accurately evaluate the time claimed as clerical to properly reflect the actual clerical work engaged. No more than 13.5 hours should be designated as such and as described in Taylor's Reply Brief, these hours should not be reduced but rather compensated at a paralegal rate of \$125 per hour.

7. Duplicative, Def. Ex. E-3. Defendants propose to cut 86.5 hours as "Duplicative," but many of Defendants' proposed cuts simply are not duplicative activities. For instance, discussions with Mr. Rosenberg and Ms. van Dalen are not duplicative simply because it involved more than one lawyer. It is important to have case management discussions in multi-party litigation exactly to avoid duplication and to coordinate presentations. Moreover, as noted above, Taylor Plaintiffs' initial fee request includes a substantial billing judgment reduction exactly to account for possible duplication. No further reduction for duplication should be made.

8. Business Development, Def. Exh E-8. Defendants propose to cut 29.1 hours of what is referenced as "business development". As detailed in our Reply brief, these time entries are not business development for Texas RioGrande Legal Aid, but rather important communications with our clients, fact development and investigation and other legitimate litigation activities. These activities generally should not be reduced. The entry for Mr. Doggett challenged by the Defendants may in fact too general to determine how it was relevant to the development of our client case and

should be reduced. A proper reduction here is 2 hours.

5. Excessive, Def. Exh. E-4: Defendants propose to cut 46.5 hours, but this includes a day of actual trial time where I claimed 9 hours for trial, (September 3, 2014). I also spent 2 hours preparing witnesses that day and coordinating with counsel for the next day of trial. Defendants seek to reduce the full entry for that day of 12 hours. Although Defendants' Exhibit F suggests the trial time for that day was 8 hours and 11 minutes, therefore a more reasonable suggested reduction would be no more than 50 minutes. (9hrs claimed v. 8hrs 11min. from Exh. F) but certainly not 12 hours. Moreover, as a lead counsel for the Taylor team, I was present and participated during the first week of trial, including examining and cross-examining witnesses. But I also assisted with the preparation of witnesses, reviewed discovery, did legal research, attend court hearings, etc. Many of the entries described in Exh D-4 involve such activities and were done within the time required to accomplish those tasks. The time claimed is not excessive. My presence at trial and at hearings was also important for later work on drafting post-trial Findings and Conclusions and helping prepare the closing argument. Finally, as noted previously, the Taylor Plaintiff fee application has already discounted a significant amount of time and no further reductions on this issues should be made.

6. Block Billing and Vague Billing, Def. Ex. D-6 and D-7: Defendants propose to cut 355.74 hours in these related categories.¹ They do this by applying a 20% reduction, but that percentage is applied to all of our time even though Defendants' Ex. E-6 and E-7 identify Block or Vague Billing on only 10.5 hrs of my 472.9 hrs claimed, 1.2 hrs of Mr. Doggetts time entries and 8.4hrs of Ms. van Dolen's entries. While there are cases supporting a 20% reduction for block or vague

¹ For this category, Defendants' Memorandum, at page 94, states the proposed cut for Block and Vague Billing as a percentage of my overall time claim (20%), which amounts to 355.74 hours.

billing, no cases support applying this figure to the entire time spent on a case except where block or vague billing infects the entire claim (which is not the case here). Applying that 20% cut to all the hours of our time is unreasonable. The time identified by Defendants as Block or Vague Billing would cut 20.1 hours. A more appropriate total for cuts for Block and Vague billing should be at most 20.1 hours.

7. Based on the above, Defendants' cuts should be calculated as follows:

<u>Category</u>	<u>Def. prop cut</u>	<u>Correct Cut</u>
Travel, Def. Exh. E-1	131.3	0
Attorney's Fees	42.1	0
Clerical, Def. Exh. E- 2	25.8	20.8hrs. @\$125.00
Duplicative, Def. Exh. E-3	86.5	0
Excessive, Def. Ex. E-4	46.5	0
Vague and Block, Def. Ex. E-6, E-7	355.74	20.1
<u>Other Defendant cuts, Def. Ex. E-5, E-8</u>		<u>2</u>
Total to reduce		

8. I therefore request an award of attorneys' fee of **\$985,688.60** for the Taylor Plaintiffs.

Market Rate

9. Our expert, Mr. Bill Edwards and I have both testified that a prevailing market rate of \$613.00 per hour, for someone of my background and experience, in this case is reasonable. The Taylor Plaintiffs adopt and rely on the prevailing party argument and authority in the common brief of the Private Plaintiffs. But in addition, as Mr. Edwards has testified, the expertise required to successfully prosecute a Voting Rights Act case such as this, requires some unique experience and expertise. In my estimation in the San Antonio Division of the Western District of Texas there are perhaps four lawyers with that kind of unique experience and background to prosecute a complicated Voting Rights Act case such as this case.

Costs

The TRLA advanced all of the costs and expenses made to properly and effectively prosecute this action. The Taylor Plaintiffs therefore request an award for all costs devoted to

this case, as amended and modified in Taylor Plaintiffs Supplemental Reply Brief in Support of Motion for Attorneys' Fees. These costs include filing fees, service costs, travel associated with development of the evidence, communicating and preparing our clients, as the litigation commence and progressed. Travel associated with the preparation for and presentation of trial, discovery expenses and expert witnesses are legitimate and should be compensated, especially when, as here, other activities were being done during the travel. These were necessary to the proper presentation of our clients' claims in this case. These expenses totaled **\$40,094.35** and are evidenced in Exhibits B-G of the Taylor Plaintiffs' Supplemental Brief in Support of Motion for Attorneys' Fees and Costs which are documentation of those expenses as listed in our brief and which are kept in the normal course of business at Texas RioGrande Legal Aid

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

/s/ Jose Garza
Jose Garza

TAYLOR EXHIBIT B

**TAYLOR PLAINTIFFS (TRLA) OUT OF POCKET EXPENSES
VEASEY, et al. v. ABBOTT, et al.**

Filing fee and process service fee:

11-21-13: filing fee -	\$400.00
12-12-13: process service fee -	\$190.00
Subtotal:	\$590.00

Expert Expenses:

Testifying expert -

Kevin Jewell -	trial prep and trial fees -	\$20,692.72
	Deposition prep and depo -	\$750.00
subtotal:		\$21,442.72

Consulting expert –

Leland Beatty -	\$10,000.00
Subtotal:	\$31,442.72

Travel expenses for client outreach and communication:

9-3-13 through 9-4-13

Robert Doggett –	Mileage 522m @ \$.45 =	\$234.90
	Meals	\$60.00
	Lodging (1 night)	\$119.60

5-21-14 through 6-19-14

Priscilla Noriega –	Mileage office to Raymondville and Sebastian	\$136.80
----------------------------	---	----------

12-10-13 through 12-11-13

Jose Garza	Mileage 631 m @ \$.45 =	\$283.95
	Meals	\$60.00
	Lodging	\$84.80

12-17-13 through 12-18-13

Jose Garza	Mileage 587 m @ \$.45 =	\$264.26
	Meals	\$60.00

6-25-14

Robert Doggett	Mileage 400m @ \$.45 =	\$180.60
	Meals	\$30.00
	Lodging	\$160.95

5-8-17

Jose Garza	Airfare	\$203.98
	Cab	\$19.00
	Meals	\$30.00
	Lodging	\$102.33

Subtotal:		\$2,031.17
------------------	--	-------------------

Travel expenses for depositions, ct. hearings and trial:**2-11-14**

Jose Garza	Mileage 305m @ \$.45 =	\$137.25
	Meals	\$30.00
	Lodging	\$114.95

2-11-14

Marinda van Dalen	Mileage 388m @ \$.45 =	\$174.60
	Meals	\$30.00
	Lodging	no charge

2-11-14

Robert Doggett	Mileage 434m @ \$.45 =	\$195.30
	Meals	\$30.00
	Lodging	no charge

3-4-14 through 3-6-14 (includes travel for client meetings)

Jose Garza	Mileage 594m @ \$.45 =	\$267.30
	Meals	\$60.00
	Lodging (2 nights)	\$254.26

3-31-14

Jose Garza	Mileage 308m @ \$.45 =	\$138.60
	Meals	\$30.00
	Lodging	\$126.55

3-31-14

Marinda van Dalen	Mileage 388m @ \$.45 =	\$174.60
	Meals	\$30.00
	Lodging	no charge

5-14-14 through 5-15-14

Marinda van Dalen	Mileage 330m @ \$.45 =	\$148.50
	Meals	\$30.00
	Lodging	\$90.85

7-17-14 through 7-18-14 (Taylor depo)

Marinda van Dalen	Car rental	\$53.48
	Meals	\$60.00
	Lodging	\$87.74

8-26-14 through 9-10-14 (Trial)

Marinda van Dalen	Car Rental	\$484.00
--------------------------	------------	----------

8-30-14 through 9-10-14 (Trial)

Marinda van Dalen	Car Rental	\$411.76
--------------------------	------------	----------

9-4-14 through 9-5-14 (Trial)

Paula Garza	Car Rental (transport client)	\$134.62
--------------------	-------------------------------	----------

8-26-14 (Trial prep)

Robert Doggett	Car Rental	\$75.28
-----------------------	------------	---------

9-1-14 (9 nights) (Trial)

Marinda van Dalen	Lodging for expert, clients, and Ms. van Dalen	\$1,770.26
	Meals	\$360.00

12-4-17 through 12-5-17 (oral argument)

Jose Garza	Airfare	\$146.96
	Meals	\$60.00

Cab	\$36.00
Lodging	\$88.60
Airport parking	\$24.00

Subtotal:	\$5,855.46
------------------	-------------------

Other Trial Expenses

Interpretation costs for E. Mendez	\$175.00
------------------------------------	----------

<u>Total out of pocket costs and expenses:</u>	<u>\$40,094.35</u>
---	---------------------------

Taylor Exhibit C

Filing Fees and Service of Process

TEXAS RIOGRANDE LEGAL AID, INC.

OUT-OF-POCKET EXPENSE STATEMENT

#9019

RECEIVED
NOV 14 2013

Employee incurring expense: JOSE GARZA

Office: SAN ANTONIO

Amount expense incurred: 11/5/2013 \$400.00

Paid to: Pay.Gov (CTS # VID07)

Purpose: Application: TXSD CM ECF - filing fees
*Receipt must be attached

PAID
NOV 21 2013

Signature of employee: [Signature]

Date: 11/11/2013

Approved by: [Signature]

Date: 11/15/13

Amount Paid:

Date:

Check #:

Account:

7901-39-00-01 (01)

93573

TEXAS RIOGRANDE LEGAL AID, INC.
300 S. TEXAS BLVD. (956) 447-6800 363-0641
WESLACO, TEXAS 78698

INTER NATION BANK
Weslaco

NON AVAILABLE

12/12/2013

PAY TO THE ORDER OF THOMAS PROCESS \$ *****190.00

One Hundred Ninety-& 00/100 Dollars

DOLLARS

TEXAS RIOGRANDE LEGAL AID, INC.
VOID AFTER 90 DAYS

~~NON-NEGOTIABLE~~

MEMO

⑈093573⑈ ⑆114915272⑆ ⑈00 0907 5⑈

TEXAS RIOGRANDE LEGAL AID, INC.

93573

T0280 THOMAS PROCESS

CK/Dep# 93573

12/12/2013

\$ *****190.00

INV#13-007635

FAI
DEC 12 2013

NON-NEGOTIABLE

TEXAS RIOGRANDE LEGAL AID, INC.

93573

THOMAS PROCESS (T0280)
605 W. 14TH ST.
AUSTIN, TX 78701

NON-NEGOTIABLE

Thomas Process

605 W. 14th Street
 Austin, TX, 78701
 Phone: (512) 320-8330
 Fax: (512) 320-8331
 scott@thomasprocess.com
 www.thomasprocess.com

Robert W. Doggett
 TEXAS RIOGRANDE LEGAL AID, INC.
 4820 N. IH 35
 Austin, Tx 78751

INVOICE: 13-007635
 11/26/2013

Cause No.: 2:13-CV-00348	Crt Date:	Received: 11/25/2013	Completed: 11/25/2013
Job ID: 13-007635	Crt Time:	Reference: Ortiz	3:25 PM
Plaintiff: BELINDA ORTIZ, et al			
Defendant: STATE OF TEXAS; JOHN STEEN, in his			
Name Srvd: STATE OF TEXAS			
Location: 1019 Brazos Street, 1st Floor, Austin, Tx 78701			

Item	Qty.	Unit	Total
Fee for Service on c/o Secretary Of State			
STATE OF TEXAS	1	\$70.00	\$70.00
JOHN STEEN, TX SECRETARY OF STATE	1	\$35.00	\$35.00
STEVE MCCRAW	1	\$70.00	\$70.00
Copies Printed for Service	3	\$5.00	\$15.00
Sub-Total			\$190.00

Total Fees \$190.00

Payment -

Balance Due \$190.00

Thank You!

PLEASE INDICATE INVOICE NUMBER ON REMITTANCE

"We Appreciate Your Business"

FEIN: 74-2954951

AFFIDAVIT ATTACHED

FAI
 DEC 12 2013

Taylor Exhibit D

Expert Expenses

TEXAS RIOGRANDE LEGAL AID, INC.
300 S. TEXAS BLVD. (956) 447-4800 383-0641
WESLACO, TEXAS 78598

INTER NATION BANK
Weslaco

NON AVAILABLE

4/24/2014

PAY TO THE
ORDER OF KEVIN JEWELL

\$ *****3530.00

Three Thousand Five Hundred Thirty-& 00/100 Dollars

DOLLARS

TEXAS RIOGRANDE LEGAL AID, INC.
VOID AFTER 90 DAYS

~~NON-NEGOTIABLE~~

MEMO

✓ ⑈094742⑈ ⑆114915272⑆ ⑈00 0907 5⑈ V

TEXAS RIOGRANDE LEGAL AID, INC.

94742

J0129 JEWELL, KEVIN

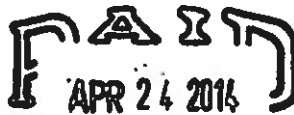
CK/Dep# 94742

4/24/2014

\$ *****3530.00

PROJECT:TRLA VOTER ID:TOTAL 35.3 @ \$100.00=\$3,530.00 PAID

S: 2/24-3/31

✓  APR 24 2014 V

NON-NEGOTIABLE

TEXAS RIOGRANDE LEGAL AID, INC.

94742

JEWELL, KEVIN (J0129)
507 ZENNIA STREET
AUSTIN, TX 78751

NON-NEGOTIABLE

Detail of Hours for the period 2/24/14 - 3/31/14

Contractor Name: Kevin Jewell
 Address: 507 Zennia St Austin TX 78751
 Phone: 512-743-7633
 Project: TRLA Voter ID

date	hours	detail
2/24/14	0.5	research
2/25/14	0.5	client call
3/4/14	0.5	client call
3/6/14	3.5	draft report
3/17/14	3.5	analysis
3/20/14	5	analysis
3/21/14	4	analysis
3/24/14	3	analysis
3/25/14	4	analysis
3/26/14	4	analysis
3/27/14	4	analysis
3/28/14	2	analysis
3/31/14	0.8	client call

Total	35.3
Rate	\$100.00
Amount Due	\$3,530.00

PAID
APR 24 2014

TEXAS RIOGRANDE LEGAL AID, INC.
300 S. TEXAS BLVD. (956) 447-4800 383-0641
WESLACO, TEXAS 78596

INTER NATION BANK
Weslaco
NON AVAILABLE

6/12/2014

PAY TO THE ORDER OF KEVIN JEWELL

\$ *****2550.00

Two Thousand Five Hundred Fifty-& 00/100 Dollars

DOLLARS

TEXAS RIOGRANDE LEGAL AID, INC.
VOID AFTER 90 DAYS

~~NON-NEGOTIABLE~~

MEMO

✓ ⑈095206⑈ ⑆114915272⑆ ⑈00 0907 5⑈ V

TEXAS RIOGRANDE LEGAL AID, INC.

95206

J0129 JEWELL, KEVIN

CK/Dep# 95206

6/12/2014

\$ *****2550.00

PROJECT:TRLA VOTER ID:TOTAL 25.5 @ \$100.00=\$2,550 PAID HRS
/2/14-5/22/14

✓ FAI JUN 12 2014 V

NON-NEGOTIABLE

TEXAS RIOGRANDE LEGAL AID, INC.

95206

JEWELL, KEVIN (J0129)
507 ZENNIA STREET
AUSTIN, TX 78751

NON-NEGOTIABLE

✓

Detail of Hours for the period 4/2/14 - 5/31/14

Contractor Name: Kevin Jewell

Address: 507 Zennia St Austin TX 78751

Phone: 512-743-7633

Project: TRLA Voter ID

date	hours	detail
4/2/14	4.0	prepare exhibits
4/3/14	4.5	prepare exhibits
4/4/14	3.5	prepare exhibits
4/7/14	3.5	prepare exhibits
4/8/14	1.5	call, followup.
4/10/14	0.5	research
4/22/14	1.0	call, followup
4/28/14	1.8	review documents, Mendez video interview.
4/29/14	0.2	client call
5/6/14	1.0	Espinoza video interview.
5/21/14	1.5	Laras and M. Lara video interview.
5/22/14	2.5	call with counsel, review documents, draft report
<hr/>		
Total	25.5	
Rate	\$100.00	
Amount Due	\$2,550.00	

PAID
JUN 12 2014

TEXAS RIOGRANDE LEGAL AID, INC.
300 S. TEXAS BLVD. (956) 447-4800 383-0641
WESLACO, TEXAS 78596

INTER NATION BANK
Weslaco

96303

NON AVAILABLE

9/30/2014

PAY TO THE ORDER OF KEVIN JEWELL

\$ *****5392.72

Five Thousand Three Hundred Ninety-Two & 72/100 Dollars

DOLLARS

TEXAS RIOGRANDE LEGAL AID, INC.
VOID AFTER 90 DAYS

~~NON-NEGOTIABLE~~

MEMO

✓ ⑈096303⑈ ⑆114915272⑆ ⑈00 0907 5⑈ V

TEXAS RIOGRANDE LEGAL AID, INC.

96303

J0129 JEWELL, KEVIN

CK/Dep# 96303

9/30/2014

\$ *****5392.72

PROJECT.TRLA VOTER ID 7/1/14-9/8/14

✓  V

NON-NEGOTIABLE

TEXAS RIOGRANDE LEGAL AID, INC.

96303

JEWELL, KEVIN (J0129)
507 ZENNIA STREET
AUSTIN, TX 78751

NON-NEGOTIABLE

Detail of Hours For The Period 7/1/14 - 9/8/14

Contractor Name: Kevin Jewell

Address: 507 Zennia St Austin TX 78751

Phone: 512-743-7633

Project: TRLA Voter ID

date	hours	detail
7/16/14	1.0	Review filed reports
7/17/14	1.5	Review filed reports
7/24/14	1.0	Review filed reports
8/1/14	0.6	call with counsel
8/2/14	1.5	Review filed rebuttal reports.
8/19/14	2.0	Milo depo questions
8/25/14	0.5	Review depo transcript.
8/25/14	0.5	Call with counsel.
9/2/14	2.0	Review Milyo depo transcript
9/3/14	0.5	Review report
9/4/14	9.0	Travel, testimony preparation, document review
9/5/14	10.0	Trial, testimony preparation, travel
9/6/14	3.0	Testimony preparation
9/7/14	9.0	Travel, testimony preparation
9/8/14	7.0	Trial, travel

Total 49.1

Rate \$100.00

Hourly Due **\$4,910.00** ✓

Mileage .862 Austin to Corpus x2

2014 IRS 0.56

Mileage Due: **\$482.72** ✓Total Amount Due **\$5,392.72**

INTER NATION
Weslaco BANK

96831

TEXAS RIOGRANDE LEGAL AID, INC.

300 S. TEXAS BLVD. (956) 447-4800 383-0641
WESLACO, TEXAS 78596

NON AVAILABLE

11/20/2014

PAY TO THE ORDER OF KEVIN JEWELL

\$ *****750.00

Seven Hundred Fifty-& 00/100 Dollars

DOLLARS

TEXAS RIOGRANDE LEGAL AID, INC.
VOID AFTER 90 DAYS~~NON-NEGOTIABLE~~

MEMO

⑈096831⑈ ⑆114915272⑆ ⑈00 0907 5⑈

TEXAS RIOGRANDE LEGAL AID, INC.

96831

J0129 JEWELL, KEVIN

CK/Dep# 96831

11/20/2014

\$ *****750.00

PROJECT:TRLA VOTER ID 8/13-8/15

PAID
NOV 20 2014

NON-NEGOTIABLE

TEXAS RIOGRANDE LEGAL AID, INC.

96831

JEWELL, KEVIN (J0129)
507 ZENNIA STREET
AUSTIN, TX 78751

NON-NEGOTIABLE

Detail of Hours for 8/15 Deposition

Contractor Name: Kevin Jewell
Address: 507 Zennia St Austin TX 78751
Phone: 512-743-7633
Project: TRLA Voter ID

date	hours	detail
8/13/14	1.5	Compile documents for subpoena
8/14/14	4.5	Depo prep
8/15/14	1.5	Depo prep and deposition
<hr/>		
Total	7.5	
Rate	\$100.00	
Amount Due	\$750.00 ✓	

PAID
NOV 20 2014

94343

TEXAS RIOGRANDE LEGAL AID, INC.
300 S. TEXAS BLVD. (956) 447-4800 383-0641
WESLACO, TEXAS 78596

INTERNATIONAL BANK
Weslaco

NON AVAILABLE

3/13/2014

PAY TO THE
ORDER OF KEVIN JEWELL

\$ *****3620.00

Three Thousand Six Hundred Twenty-& 00/100 Dollars

DOLLARS

TEXAS RIOGRANDE LEGAL AID, INC.
VOID AFTER 90 DAYS

~~NON-NEGOTIABLE~~

MEMO

⑈094343⑈ ⑆114915272⑆ ⑈00 0907 5⑈

TEXAS RIOGRANDE LEGAL AID, INC.

94343

J0129 JEWELL, KEVIN

CK/Dep# 94343

3/13/2014

\$ *****3620.00

PROJECT: TRLA VOTER ID

FAI
MAR 13 2014

NON-NEGOTIABLE

TEXAS RIOGRANDE LEGAL AID, INC.

94343

JEWELL, KEVIN (J0129)
507 ZENNIA STREET
AUSTIN, TX 78751

NON-NEGOTIABLE

Detail of Hours for the period 1/1/14 - 2/18/14

Contractor Name: Kevin Jewell
 Address: 507 Zennia St Austin TX 78751
 Phone: 512-743-7633
 Project: TRLA Voter ID

date	hours	detail
1/7/14	0.7	client call
1/13/14	1.0	client call, frame report draft
1/14/14	0.5	draft client questions
1/21/14	1.0	review documents
1/22/14	0.5	client call
1/23/14	2.0	review census data
1/27/14	1.5	review documents
1/28/14	1.0	client call
1/30/14	3.5	review data
2/5/14	2.0	client call, review data
2/6/14	5.5	draft report, analysis
2/7/14	3.5	draft report, analysis
2/10/14	4.5	draft report, analysis
2/11/14	3.5	client call, draft report
2/12/14	2.0	draft report, analysis
2/13/14	2.0	draft report, analysis
2/18/14	1.5	client call, followup

PAID
MAR 13 2014

Total 36.2
Rate \$100.00
Amount Due **\$3,620.00**

TEXAS RIOGRANDE LEGAL AID, INC.
300 S. TEXAS BLVD. (956) 447-4800 383-0641
WESLACO, TEXAS 78596

INTER NATION BANK
Weslaco

95610

NON AVAILABLE

7/24/2014

PAY TO THE ORDER OF KEVIN JEWELL

\$ *****5600.00

Five Thousand Six Hundred & 00/100 Dollars

DOLLARS

TEXAS RIOGRANDE LEGAL AID, INC.
VOID AFTER 90 DAYS

~~NON-NEGOTIABLE~~

MEMO

✓ ⑈095610⑈ ⑆114915272⑆ ⑈00 0907 5⑈ V

TEXAS RIOGRANDE LEGAL AID, INC.

95610

J0129 JEWELL, KEVIN

CK/Dep# 95610

7/24/2014

\$ *****5600.00

PROJECT:TRLA VOTER ID 6/1/14-6/27/14

✓ FAID JUL 24 2014 V

NON-NEGOTIABLE

TEXAS RIOGRANDE LEGAL AID, INC.

95610

JEWELL, KEVIN (J0129)
507 ZENNIA STREET
AUSTIN, TX 78751

NON-NEGOTIABLE

Detail of Hours for the period 6/1/14 - 6/27/14

Contractor Name: Kevin Jewell
Address: 507 Zennia St Austin TX 78751
Phone: 512-743-7633
Project: TRLA Voter ID

date	hours	detail
6/11/14	6.0	review documents, prepare exhibits
6/12/14	3.5	review documents, draft report
6/13/14	1.5	draft report.
6/20/14	7.5	draft report.
6/23/14	7.0	draft report
6/24/14	5.0	finalize exhibits
6/25/14	8.5	finalize report
6/26/14	10.0	finalize report
6/27/14	7.0	finalize report

Total 56.0
Rate \$100.00
Amount Due **\$5,600.00** ✓

PAID
JUL 24 2014

TEXAS RIOGRANDE LEGAL AID, INC.

300 S. TEXAS BLVD. (956) 447-4800 383-0641
WESLACO, TEXAS 78596

INTER NATION
Weslaco ANK

96565

NON AVAILABLE

10/30/2014

PAY TO THE ORDER OF LELAND BEATTY

\$ ****10000.00

Ten Thousand & 00/100 Dollars

DOLLARS

TEXAS RIOGRANDE LEGAL AID, INC.
VOID AFTER 90 DAYS

~~NON-NEGOTIABLE~~

MEMO

⑈096565⑈ ⑆114915272⑆ ⑈00 0907 5⑈

TEXAS RIOGRANDE LEGAL AID, INC.

96565

B0272 BEATTY, LELAND

CK/Dep# 96565

10/30/2014

\$ ****10000.00

F A I
OCT 30 2014

NON-NEGOTIABLE

TEXAS RIOGRANDE LEGAL AID, INC.

96565

BEATTY, LELAND (B0272)
1103 UPLAND DRIVE
AUSTIN, TX 78741

NON-NEGOTIABLE

Leland Beatty
1103 Upland Drive
Austin, Texas 78741

INVOICE

For services rendered.

- Review of multiple data sets provided in the voter id case
- Analysis for patterns in voters without id
- Preparation and delivery of report on analysis
- Discussion and consultations on various aspects of case and data issues

TOTAL \$10,000



Taylor Exhibit E

Travel Expenses (Clients)

RECEIVED
OCT - 2 2013

BEST WESTERN PARADISE INN6301 SOUTH PADRE ISLAND DRIVE
CORPUS CHRISTI, TX 78412THE WORLD'S LARGEST
HOTEL CHAIN®

(361) 992-3100

09/04/2013 08:30 AM

Registered To:DOGGETT, ROBERT WAYNE
4308 BELLVUE AVENUE
AUSTIN, TX 78756

(512) 374-2725

Room # 234-A

Conf # 42471

Arrival 09/03/13

Departure 09/04/13

Room Type QQNS-2 QUEEN

Guests 2 / 0

Payment Visa/Master

Acct XXXX-XXXX-XXXX-9651

Posting	Oper	AcctCo	Description	From	Reference	Amount
09/03/13	Karen	RC	ROOM CHRG REVENUE			\$104.00
09/03/13	Karen	9C	CITY TAX			\$9.36
09/03/13	Karen	91S	STATE TAX			\$6.24
09/04/13	Karen	VS	PAYMENT VISA/MC		9651 - 00667D	\$119.60-
Balance Due						\$0.00

OCT 15 2013

THE UNDERSIGNED GUEST AGREES TO PAY THE AMOUNT INDICATED ON THE BALANCE DUE PORTION OF THIS INVOICE. IF THE CHARGES ARE TO BE BILLED TO A THIRD PARTY, THE UNDERSIGNED AGREES TO BE PERSONALLY LIABLE FOR PAYMENT

OF THE CHARGES IN THE EVENT THAT THE INDICATED THIRD PARTY, PERSON, COMPANY OR ASSOCIATION FAILS TO PAY FOR ANY PART OR THE FULL AMOUNT OF SUCH CHARGES.

Signature

Office
BrownsvilleTOTAL
AMOUNT
CLAIMED

ABSTRACT NO.:

Alt No.



105

12-11-13

Jose Garza	Folio No. :	Room No. : 118
7414 Robin Rest Dr	A/R Number :	Arrival : 12-10-13
San-Antonio TX 78209-3134	Group Code :	Departure : 12-11-13
US	Company : Business	Conf. No. : 63440039
	Membership No. : PC 966822935	Rate Code : IDAAA
	Invoice No. :	Page No. : 1 of 1

Date	Description	Charges	Credits
12-10-13	*Accommodation	75.05	
12-10-13	State Tax - Room	4.50	
12-10-13	City Tax - Room	5.25	
12-11-13	American Express		84.80

XXXXXXXXXXXX3002

Thank you for staying at the Holiday Inn Express Weslaco . Qualifying points for this stay will automatically be credited to your account. To make additional reservations online, update your account information or view your statement please visit www.priorityclub.com. We look forward to welcoming you back soon.

Total	84.80	84.80
Balance	0.00	

Guest Signature: _____

I have received the goods and / or services in the amount shown heron. I agree that my liability for this bill is not waived and agree to be held personally liable in the event that the indicated person, company, or associate fails to pay for any part or the full amount of these charges. If a credit card charge, I further agree to perform the obligations set forth in the cardholder's agreement with the issuer.

Independently Owned and Operated by RGV Express Limited

DEC 19 2013

Holiday Inn Express Weslaco Hotel and Suites
 421 S. International Blvd.
 Weslaco, TX 78596
 Telephone: (956) 973-2222 Fax: (956) 968-9222

RECEIVED
JAN 10 2014

Emerald Beach Hotel

121

06-26-14

robert doggett
4308 bellvue avenue
Austin TX 78756
US

Folio No. :
A/R Number :
Group Code :
Company :
Invoice No. :
Reference No. :

Room No. : 0313
Arrival : 06-25-14
Departure : 06-26-14
Conf. No : 2622482
Rate Code : IGCOR
Page No. : 1 of 1

Date	Description	Charges	Credits
06-25-14	*Room	139.95	
06-25-14	State Hotel Tax	8.40	
06-25-14	City Hotel Tax	12.60	
Total		160.95	0.00
Balance		160.95	

Guest Signature: _____

(Owned by Shoreline Hotel Venture LP and Operated by Kirby Hotel Management Co)

PAID
JUL 31 2014

I have received the goods and / or services in the amount shown hereon. I agree that my liability for this bill is not waived and agree to be held personally liable in the event that the indicated person, company, or association fails to pay for any part or the full amount of these charges. If a credit card charge, I further agree to perform the obligations set forth in the cardholder's agreement with the issuer.

Emerald Beach Hotel
1102 S. Shoreline Blvd
Corpus Christi, TX 78401
Telephone: (361) 883-5731 Fax: (361) 883-9079

9019

01

Account No: _____
Account No: _____

From: Southwest Airlines <SouthwestAirlines@luv.southwest.com>
To: garzpalm <garzpalm@aol.com>
Subject: Flight reservation (5QB344) | 08MAY17 | AUS-HRL | Garza/Jose
Date: Fri, May 5, 2017 4:08 pm

F A I
MAY 17 2017

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Southwest

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Ready for takeoff!



Thanks for choosing Southwest® for your trip. You'll find everything you need to know about your reservation below. Happy travels!



Air itinerary

AIR Confirmation: 5QB344

Confirmation Date: 05/5/2017

Passenger(s)	Rapid Rewards #	Ticket #	Expiration	Est. Points Earned
GARZAJOSE	704266	5262102798478	May 5, 2018	1059

Rapid Rewards points earned are only estimates. Visit your (MySouthwest, Southwest.com or Rapid Rewards) account for the most accurate totals - including A-List & A-List Preferred bonus points.

Date	Flight	Departure/Arrival
Mon May 8	277	Depart AUSTIN, TX (AUS) on Southwest Airlines at 3:00 PM Arrive in HARLINGEN, TX (HRL) at 4:00 PM Travel Time 1 hrs 0 mins <u>Senior</u>



Check In for your flight(s): 24 hours before your trip on Southwest.com or your mobile device to secure your boarding position. You'll be assigned a boarding position based on your check-in time. The earlier you check in within 24 hours of your flight, the earlier you get to board.



Bags fly free®: First and second checked bags. Weight and size limits apply. One small bag and one personal item are permitted as carryon items, free of charge.



30 minutes before departure: We encourage you to arrive in the gate area no later than 30 minutes prior to your flight's scheduled departure as we may begin boarding as early as 30 minutes before your flight.



10 minutes before departure: You must obtain your boarding pass(es) and be in the gate area for boarding at least 10 minutes prior to your flight's scheduled departure time. If not, Southwest may cancel your reserved space and you will not be eligible for denied boarding compensation.

Save up to 30%
 Plus earn up to 2,400 Rapid Rewards® points.
 Let's go!
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EarlyBird Check-In®
 Let us take care of check-in for you.
 Get it now

Add a hotel
 ✓ Earn Rapid Rewards® points
 ✓ Best rate guarantee
 ✓ Free cancellation
 Book a hotel >

Add a rental car
 ✓ Earn Rapid Rewards® points
 ✓ Guaranteed low rates
 ✓ Free cancellation
 Book a car >



If you do not plan to travel on your flight: In accordance with Southwest's No Show Policy, you must notify Southwest at least 10 minutes prior to your flight's scheduled departure if you do not plan to travel on the flight. If not, Southwest will cancel your reservation and all funds will be forfeited.

Need to make a change? Keep your confirmation number on record. It will be used to retrieve your reservation and apply funds to future travel.

Air Cost: 203.98

Fare Rule(s): 5262102798478: NONTRANSFERABLE/AGE 65 OR OVER/ID REQUIRED.

Valid only on Southwest Airlines. All travel involving funds from this Confirmation Number must be completed by the expiration date. Unused travel funds may only be applied toward the purchase of future travel for the individual named on the ticket. Any changes to this itinerary may result in a fare increase.

AUS WN HRL176.54QCD 176.54 END ZPAUS XFAUS4.5 AY5.60\$AUS5.60



Learn about our boarding process



Learn about inflight WiFi & entertainment

Cost and Payment Summary

✈ AIR - 5QB344

Base Fare	\$ 176.54	Payment Information
Excise Taxes	\$ 13.24	Payment Type: Amer Express XXXXXXXXXXXX3002
Segment Fee	\$ 4.10	Date: May 5, 2017
Passenger Facility Charge	\$ 4.50	Payment Amount: \$203.98
September 11th Security Fee	\$ 5.60	
Total Air Cost	\$ 203.98	

Useful Tools

[Check In Online](#)
[Early Bird Check-In](#)
[View/Share Itinerary](#)
[Change Air Reservation](#)
[Cancel Air Reservation](#)
[Check Flight Status](#)
[Flight Status Notification](#)
[Book a Car](#)
[Book a Hotel](#)

Know Before You Go

[In the Airport](#)
[Baggage Policies](#)
[Suggested Airport Arrival Times](#)
[Security Procedures](#)
[Customers of Size](#)
[In the Air](#)
[Purchasing and Refunds](#)

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Southwest

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Country Inn And Suites By Carlson Harlingen, Tx

3825 South Expressway 83, Harlingen, Texas 78550

Your Reservation Receipt

Booking Number	WF9F9K8
Guest Name	Jose Garza
Check In	Monday, May 8, 2017 @ 3:00 PM
Check Out	Tuesday, May 9, 2017 @ 11:00 AM
Room Type	Double Occupancy Room, Assigned By Hotel At Check In
Length of Stay	1 Night

Cancellation Policy

Immediately upon confirmation, this booking is completely non-refundable. Changes without penalty are also not guaranteed.

Payment and Rate Information

Average Room Cost Per Night	\$91.00 USD
Total Room Cost for 1 Night	\$91.00 USD

Payment Information

Taxes & Fees	\$11.33 USD
Total Charges	\$102.33 USD

Important Information

Minimum age for check in is 21 years old with a valid ID and credit card. No-show is subjected to full charge penalty.

Card	AMEX ending in 3002
------	---------------------

Status	Confirmed - paid in full on 07 May 2017
--------	---

The above charges will appear on your card from RTI*SWHotels Country Inn

FAI
MAY 17 2017

F : _____

RECEIPT		DATE <u>04-08-17</u>	No. <u>392349</u>
RECEIVED FROM <u>Platinum Transportation</u>		<u>\$19.00</u>	
<input type="radio"/> FOR RENT		<input checked="" type="radio"/> <u>TAXI</u>	
<input type="radio"/> FOR		<input checked="" type="radio"/> <u>MAY 17 2017</u>	
ACCOUNT		<input type="radio"/> CASH	
PAYMENT	<u>19</u> <u>00</u>	<input type="radio"/> CHECK	
BAL. DUE	<u>0</u>	<input type="radio"/> MONEY ORDER	
		<input type="radio"/> CREDIT CARD	
		FROM <u>VIA</u>	TO <u>Courty Ln</u>
		BY <u>VAL N.</u>	

PAID
MAY 17 2017

PAID

Taylor Exhibit F

Travel Expenses (Depositions, Hearings, Trial)

RECEIVED
FEB 21 2014

Emerald Beach Hotel

02-12-14

N/A Jose Garza
7414 Robin Rest Dr.
san antonio TX 78209
US

Folio No. :
A/R Number :
Group Code :
Company :
Invoice No. :
Reference No. :

Room No. : 0617
Arrival : 02-11-14
Departure : 02-12-14
Conf. No : 2452953
Rate Code : IGBAR
Page No. : 1 of 1

Date	Description	Charges	Credits
02-11-14	*Room	99.95	
02-11-14	State Hotel Tax	6.00	
02-11-14	City Hotel Tax	9.00	
Total		114.95	0.00
Balance		114.95	

Guest Signature: _____

(Owned by Shoreline Hotel Venture LP and Operated by Kirby Hotel Management Co)

PAID
FEB 27 2014

I have received the goods and / or services in the amount shown hereon. I agree that my liability for this bill is not waived and agree to be held personally liable in the event that the indicated person, company, or association fails to pay for any part or the full amount of these charges. If a credit card charge, I further agree to perform the obligations set forth in the cardholder's agreement with the issuer.

Emerald Beach Hotel
1102 S. Shoreline Blvd
Corpus Christi, TX 78401
Telephone: (361) 883-5731 Fax: (361) 883-9079

RECEIVED
FEB 21 2014

RECEIVED
MAR - 7 2014

RECEIVED
MAR 10 2014



Holiday Inn

30

03-05-14

Jose Garza	Folio No. :	Room No. : 809
7414 ROBIN REST DR	A/R Number :	Arrival : 03-04-14
Corpus Christi Tx	Group Code :	Departure : 03-05-14
San Antonio TX 78209	Company : Leslure	Conf. No. : 65992169
United States	Membership No. :	Rate Code : IDAAA
	Invoice No. :	Page No. : 1 of 1

Date	Description	Charges	Credits
03-04-14	*Accommodation	139.00	
03-04-14	State Occupancy Tax	8.34	
03-04-14	City Occupancy Tax	12.51	
03-04-14	Parking	10.00	
03-05-14	American Express		169.85
Total		169.85	169.85
Balance		0.00	

Guest Signature:

I have received the goods and / or services in the amount shown hereon. I agree that my liability for this bill is not waived and agree to be held personally liable in the event that the indicated person, company, or associate fails to pay for any part or the full amount of these charges. If a credit card charge, I further agree to perform the obligations set forth in the cardholder's agreement with the issuer.

F A I
MAR 13 2014

Holiday Inn Marina
707 North Shoreline Boulevard
Corpus Christi, TX 78401
Telephone: 361-882-1700 Fax: 361-882-3113



105

03-06-14

Jose Garza 7414 Robin Rest Dr San-Antonio TX 78209-3134 United States	Folio No.	:		Room No.	:	112
	A/R Number	:		Arrival	:	03-05-14
	Group Code	:		Departure	:	03-06-14
	Company	:	TEXAS RIO GRANDE LEGAL AID	Conf. No.	:	66874843
	Membership No.	:	PC 966822935	Rate Code	:	IDOTH
	Invoice No.	:		Page No.	:	1 of 1

Date	Description	Charges	Credits
03-05-14	*Accommodation	74.70	
03-05-14	State Tax - Room	4.48	
03-05-14	City Tax - Room	5.23	
03-06-14	American Express		84.41

XXXXXXXXXXXX3002

Thank you for staying at the Holiday Inn Express Weslaco. Qualifying points for this stay will automatically be credited to your account. To make additional reservations online, update your account information or view your statement please visit www.priorityclub.com. We look forward to welcoming you back soon.

Total	84.41	84.41
Balance	0.00	

Guest Signature: _____

I have received the goods and / or services in the amount shown heron. I agree that my liability for this bill is not waived and agree to be held personally liable in the event that the indicated person, company, or associate fails to pay for any part or the full amount of these charges. If a credit card charge, I further agree to perform the obligations set forth in the cardholder's agreement with the issuer.

Independently Owned and Operated by RGV Express Limited

MAR 13 2014

Holiday Inn Express Weslaco Hotel and Suites
421 S. International Blvd.
Weslaco, TX 78596
Telephone: (956) 973-2222 Fax: (956) 968-9222



Holiday Inn

04-01-14

Jose Garza	Folio No. :	Room No. : 516
7414 Robin Rest Dr.	A/R Number :	Arrival : 03-31-14
San Antonio Tx	Group Code :	Departure : 04-01-14
SAN ANTONIO TX 78209	Company : LEISURE	Conf. No. : 64818633
United States	Membership No. :	Rate Code : IMGOV
	Invoice No. :	Page No. : 1 of 1

Date	Description	Charges	Credits
03-31-14	*Accommodation	97.00	
03-31-14	State Occupancy Tax	5.82	
03-31-14	City Occupancy Tax	8.73	
03-31-14	Valet Parking	15.00	
03-31-14	American Express		126.55
Total		126.55	126.55
Balance		0.00	

Guest Signature: _____

I have received the goods and / or services in the amount shown heron. I agree that my liability for this bill is not waived and agree to be held personally liable in the event that the indicated person, company, or associate fails to pay for any part or the full amount of these charges. If a credit card charge, I further agree to perform the obligations set forth in the cardholder's agreement with the issuer.

PAID
APR 15 2014

RECEIVED
APR 10 2014

Holiday Inn Marina
707 North Shoreline Boulevard
Corpus Christi, TX 78401
Telephone: 361-882-1700 Fax: 361-882-3113

Name:	Marinda van Dalen	Office:	Brownsville
Destination:	Corpus Christi TX- US Court	File Number:	VLD07
Purpose of Trip:	Status Conference Hearing		

Departed from: Home ☒ Office Time of Departure: 12:00 PM Date: 3/31/14
 Returned to: Home ☒ Office Time of Return: 9:00 PM Date: 4/1/14

Date	From	To	Odometer #s	Miles
3/31/14	Brownsville	Rock Port, TX		
	Beginning			
4/1/14	Rock Port, TX	Brownsville		194
	Beginning			
	From:			
	Beginning			194
	From:			
	Beginning			0
	From:			
	Beginning			0
	From:			
	Beginning			
Miles are paid at \$0.45			Total Miles	388
Total Allowance for Personal Automobile Use				\$174.60

DEPARTURE DATE	TIME	FROM	TO	ARRIVAL DATE	TIME
				Total Air Fare Expense	
Did TRLA pay airfare in advance, please place an X in the following				YES	NO

DATE(S) of Trip	Cost
03/31/14	\$30.00
04/01/14	\$30.00
	\$0.00
	\$0.00
	\$0.00
	\$0.00
	\$0.00
	\$0.00
	\$0.00
Total Meal Expenses	\$60.00

DATE(S)	# of Nights	Night&Tax	Amt Per Day	Cost
		Night&Tax		\$0.00
		Night&Tax		\$0.00
		Night&Tax		\$0.00
		Night&Tax		\$0.00
		Night&Tax		\$0.00
		Night&Tax		\$0.00
		Night&Tax		\$0.00
		Night&Tax		\$0.00
		Night&Tax		\$0.00
			Total Lodging Expenses	\$0.00

EXPENSES	Date	Cost
Cab Fare		
Car Rental		
Shuttle		
Parking		
Tips & Incidentals		
(Explain)		
	Total of Other Expenses	\$0.00

APR 15 2014

Grand Total \$	234.60
-----------------------	---------------

Amount Claimed: \$	234.60
ADVANCE RECEIVED: \$	0.00
Advance Check Number:	
Advanced Airfare: \$	0.00

Amount Due Traveler : \$ 234.80
Amount Due TRLA : \$

I certify that this statement, the attachments and amounts claimed are true, correct, and complete and that payment for the amount claimed has not been received.

Employee Signature

Date _____

Primary Supervisor's Signature

FOR ACCOUNTING USE ONLY

Account No:

Account No:

Account No:

Account No:

RECEIVED
APR - 7 2014

11/10/14
D1

Name:	Marinda van Dalen	Office:	Brownsville
Destination:	Corpus Christi TX- US Court	File Number:	VID07
Purpose of Trip:	Status Conference Hearing		

Personal Automobile Use			Miles Driven		
Date	5/14/14	From: Brownsville	To: Corpus Christi TX		
		Beginning	Ending	Odometer #s	185
Date	4/4/15	From: Corpus Christi TX	To: Brownsville		
		Beginning	Ending	Odometer #s	185
Date		From:	To:		
		Beginning	Ending	Odometer #s	0
Date		From:	To:		
		Beginning	Ending	Odometer #s	0
			Miles are paid at \$0.45		Total Miles
			Total Allowance for Personal Automobile Use		330
					\$148.50

DEPARTURE DATE	TIME	FROM	TO	ARRIVAL DATE	TIME
				Total Air Fare Expense	
Did TRLA pay airfare in advance, please place an X in the following				YES	NO

DATE(S) of Trip		Cost
05/14/14		\$30.00
		\$0.00
		\$0.00
		\$0.00
		\$0.00
		\$0.00
		\$0.00
		\$0.00
	Total Meal Expenses	\$30.00

DATE(S)	# of Nights		Amt Per Day	Cost
5/14/14	1	Night&Tax	\$90.85	\$90.85
		Night&Tax		\$0.00
		Night&Tax		\$0.00
		Night&Tax		\$0.00
		Night&Tax		\$0.00
		Night&Tax		\$0.00
		Night&Tax		\$0.00
		Night&Tax		\$0.00
		Night&Tax		\$0.00
		Total Lodging Expenses		\$90.85

EXPENSES	Date	Cost
Cab Fare		
Car Rental		
Shuttle		
Parking		
Tips & Incidentals		
(Explain)		
Total of Other Expenses		\$0.00

Amount Due Traveler : \$ 289.35
Amount Due TRLA : \$ _____

Employee Signature _____ Date 5/10/17 Primary Supervisor's Signature _____ Date _____

Account No: _____
Account No: _____

Account No: _____
Account No: _____

RECEIVED
MAY 20 2014

**SUPER 8 CORPUS CHRISTI**

411 N. SHORELINE BLVD.
 CORPUS CHRISTI, TX 78401 US
 Phone: (361) 884-4815
 Fax: (361) 884-3111
 Email: super8bf@yahoo.com
 Printed: 5/15/2014 7:36:34 AM

Folio (Detailed)

Name:	VANDALEN, MARINDA O		Confirmation Number:	16692450
			Account Number:	987-610779
Address:	207 E WASHINGTON ST BROWNSVILLE, TX 78520 US			
Room:	206	Room Type:	NQ1, 1 QUEEN NSMK	Nights: 1
Rate Plan:	RACK	Daily Rate:	\$79.00 + \$11.85 Tax	GTD: VI - VISA
Arrival:	5/14/2014 (Wed)	Departure:	5/15/2014 (Thu)	XXXX XXXX XXXX 8272
				Guests: 1/0

Room Rate:

5/14/2014 (Wed) - 5/14/2014 (Wed) \$79.00 + \$11.85 Tax per night.

Date	Code	Description	Amount	Balance
5/14/2014	RM	ROOM CHARGE	\$79.00	\$79.00
5/14/2014	TAX1	STATE TAX	\$4.74	\$83.74
5/14/2014	TAX2	CITY TAX	\$7.11	\$90.85
5/15/2014	VI	VISA XXXX XXXX XXXX 8272	(\$90.85)	\$0.00

Summary

Room	Tax	F&B	Other	CC	Cash	DB
\$79.00	\$11.85	\$0.00	\$0.00	(\$90.85)	\$0.00	\$0.00

By signing below, I agree to these terms and conditions.

Guest Signature:

(1) Regardless of charge instructions, the undersigned acknowledges the above as personal indebtedness. (2) This property is privately owned and management reserves the right to refuse services to any one, and will not be responsible for injury or accidents to guests or loss of money, jewelry or any personal valuables of any kind.

"We or our affiliates may contact you about goods and services unless you call 888-946-4283 or write to Opt Out/Privacy, Wyndham Hotel Group, LLC, 22 Sylvan Way, Parsippany, NJ 07054 to opt out. View our website about privacy."

F A S T
 MAY 30 2014

Name:	Marinda van Dalen	Office:	Brownsville
Destination:	Corpus Christi	File Number:	VID07
Purpose of Trip:	Depo prep meeting & Depo of Lenard Taylor		

Departed from:	<input type="checkbox"/> Home	<input checked="" type="checkbox"/> Office	Time of Departure:	<input type="text" value="9:30"/>	Date:	<input type="text" value="7/17/14"/>
Returned to:	<input checked="" type="checkbox"/> Home	<input type="checkbox"/> Office	Time of Return:	<input type="text" value="6:30 PM"/>	Date:	<input type="text" value="7/18/14"/>

Date	From	To	Odometer #'s	Miles Driven
	Beginning	Ending		0
Date	From	To	Odometer #'s	
	Beginning	Ending	Odometer #'s	0
Date	From	To	Odometer #'s	
	Beginning	Ending	Odometer #'s	0
Date	From	To	Odometer #'s	
	Beginning	Ending	Odometer #'s	0

Miles are paid at \$0.45	Total Miles	0
Total Allowance for Personal Automobile Use		\$0.00

****Receipts required****

DEPARTURE DATE	TIME	FROM	TO	ARRIVAL DATE	TIME
				Total Air Fare Expense	
Did TRLA pay airfare in advance, please place an X in the following				YES	NO

Did TRLA pay airfare in advance, please place an X in the following

Meal Allowance:

DATE(S) of Trip	Cost
07/17/14	\$30.00
07/18/14	\$30.00
	\$0.00
	\$0.00
	\$0.00
	\$0.00
	\$0.00
	\$0.00
Total Meal Expenses	\$60.00

****Receipts required****

DATE(S)	# of Nights		Amt Per Day	Cost
7/17/14	1	Night&Tax	\$87.74	\$87.74
		Night&Tax		\$0.00
		Night&Tax		\$0.00
		Night&Tax		\$0.00
		Night&Tax		\$0.00
		Night&Tax		\$0.00
		Night&Tax		\$0.00
		Night&Tax		\$0.00
		Night&Tax		\$0.00
			Total Lodging Expenses	\$87.74

****Receipts required****

EXPENSES	Date	Cost
Cab Fare		
Car Rental		
Shuttle		
Parking		\$8.50
Tips & Incidentals	Gasoline	\$46.98
(Explain)		
	Total of Other Expenses	\$53.48

Grand Total \$	201.22
-----------------------	---------------

Amount Claimed: \$	201.22
ADVANCE RECEIVED: \$	0.00
Advance Check Number:	
Advanced Airfare: \$	0.00

Amount Due Traveler : \$ 201.22
Amount Due TRLA : \$

I certify that this statement, the attachments and amounts claimed are true, correct, and complete and that payment for the amount claimed has not been received.

Employee Signature

Date _____

Primary Supervisor's Signature

Date _____

FOR ACCOUNTING USE ONLY

Account No: 7445-22.10-01

Account No:

Account No:

Account No:

TEAN SERVICES, LLC
PO BOX 840173
KANSAS CITY, MO 64184-0173

For Billing Inquiries
(866) 278-9894
ARINQUIRY@EHI.COM

ENTERPRISE HOLDINGS

Alamo Enterprise National

TEXAS RIO GRANDE LEGAL AID
Rental Summary

Consolidated Inv. #: 3331017
Consolidated Inv. Date: 20-Sep-2014

Fed Tax Id : 430724835

Rental Agreement #	Bill Ref#	External Customer Ref#	Reservation Number	Renter	Rental Location	Rental Date	Return Date	Amount Due
--------------------	-----------	------------------------	--------------------	--------	-----------------	-------------	-------------	------------

Enterprise Rent-A-Car
Contract ID / Account Number K10265D TEXAS RIO GRANDE LEGAL AID
Billing Number 863927 TEXAS RIO GRANDE LEGAL AID

146326600	90060088451	7445-48-01-R3 URAH	588180583	JONAS, STACIE ✓	NEWARK, NJ	09/07/14	09/10/14	154.68
146417721	90060128740	7445-39-00-01 01-104834	796557843	NORIEGA, RAUL ✓	HARLINGEN, TX	09/10/14	09/11/14	81.90
146630121	90060397876	7445-20-00-01-02	390028730	CARRASCO, RAFAEL ✓	SAN ANTONIO, TX	09/19/14	09/20/14	80.87
146642918	90060399834	7445-20-00-01-02	389909520	WYATT, MICHAEL ✓	SAN ANTONIO, TX	09/19/14	09/20/14	46.69
89LKC7	700004668904	7445-35-00-05 TASCO	88Y07Q	BELTRAN, MARIA ✓	NASHVILLE, TN	08/25/14	08/27/14	97.45
89WYKO	500004633061	7445-48-01-01 VID07	89RHTJ	DOGETT, ROBERT	AUSTIN, TX	08/26/14	08/27/14	75.28
89VJLC	650004464946	7445-22-00-01 VID07	TNGG8S	VAN DALEN, MARINDA	BROWNSVILLE, TX	08/26/14	09/12/14	484.00
8BB02Z	500004743941	7445-46-07-01 88-RAMOS	TNGVVF	RAMOS, ROMAN ✓	LAREDO, TX	08/27/14	09/04/14	429.77
8BBBRM	750004647838	7445-43-00-01 NIX08	750004647838	RIOJAS, JAVIER	EAGLE PASS, TX	08/27/14	08/28/14	76.85
8CDDJK	500004831857	7445-48-01-01 VID07	0000900776	DOGETT, ROBERT	AUSTIN, TX	08/30/14	09/10/14	411.76
8C6CJF	750004725300	7445-43-00-01 NIX08	8BBFGR	RIOJAS, JAVIER	EAGLE PASS, TX	09/02/14	09/04/14	91.81
W8H5	800004528465	7445-35-01-01-03-63	8CDBMB	O'ROURKE, ERIN ✓	NASHVILLE, TN	09/04/14	09/08/14	262.64
8CYOX2	900004817477	7445-39-00-01 03-174510	TNS6JR	MEDINA, VERONICA	SAN ANTONIO, TX	09/04/14	09/05/14	74.37
8CYC4L	650004379263	7445-32-00-01 VID07	8CQVHD	GARZA, PAULA ✓	BROWNSVILLE, TX	09/04/14	09/05/14	134.62
8DYLRF	900004890945	7445-39-00-01 88-TRAM	88-TRAM	BONE, POLLY ✓	SAN ANTONIO, TX	09/09/14	09/11/14	74.73
8F0CVM	550004802582	7445-39-00-01	8DJLB9	GUERRA, MONICA ✓	SAN ANTONIO, TX	09/09/14	09/13/14	177.05
8FBYVW2	500004854544	7445-48-01-01 01-103296	8F7DLC	FLORES, FABIOLA ✓	AUSTIN, TX	09/11/14	09/12/14	37.36
8FC5Z4	900004901416	7445-39-00-01 19-215387	8F50SC	DONALDSON, SARAH	SAN ANTONIO, TX	09/11/14	09/11/14	37.36
8FC5XV	800004598894	7445-48-01-01	TN1FOX	REED, MARY CHRISTINE ✓	AUSTIN, TX	09/11/14	09/12/14	74.73

EAN SERVICES, LLC
 PO BOX 840173
 KANSAS CITY, MO 64184-0173

For Billing Inquiries
 (866) 278-9894
 ARINQUIRY@EHI.COM

ENTERPRISE HOLDINGS

Alamo  National

TEXAS RIO GRANDE LEGAL AID
 Rental Summary

Consolidated Inv. #: 3331017
 Consolidated Inv. Date: 20-Sep-2014

Fed Tax Id : 430724835

Rental Agreement #	Bill Ref#	External Customer Ref#	Reservation Number	Renter	Rental Location	Rental Date	Return Date	Amount Due	
Enterprise Rent-A-Car									
AFK72Y	900004923225	7445-472101	82-59734	TNYRYH	WELCH, STEPHANIE	EL PASO, TX	09/11/14	09/12/14	53.05
23TW	750004894334	7445-43201	11-18646	8F3UOV	ESTRADA-RIOJAS, IRASEMA	EAGLE PASS, TX	09/15/14	09/16/14	42.34
8GDYRK	500004963618	7445-48201	JOCRFS	GARZA, ROBERT	AUSTIN, TX	09/16/14	09/19/14	175.21	
K10265D TEXAS RIO GRANDE LEGAL AID - Billing Number 863927									
Grand Total in USD									3,174.52

Enterprise Rent A Car Grand Total For Account Number TEXAS RIO GRANDE LEGAL AID in USD

3,174.52

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 OCT - 9 2014



Fed Tax Id : 430724835

Consolidated Inv. #
Rental Agreement

Bill Ref #

Invoice Date

3831017

8CYC4L

650004379263

20-Sep-2014

Bill To Information

TEXAS RIO GRANDE LEGAL AID
300 S TEXAS
WESLACO, TX - 78496

Rental Information

Reservation Number : 8CQVHD
Driver : GARZA, PAULA
Additional Driver : NORIEGA, PRISCILLA
Pickup Date/Time : 09/04/2014 14:54
Return Date/Time : 09/05/2014 18:01
Miles/kms : 348
Car Class : MVAR Requested Class : MVAR

Vehicle Information

Yr/Make/Model	VIN	License No	Beg/End/Distance
2014/DODGE/GCA	ER127855	CGZ7114	34981/35329/348

Rental Branch

BROWNSVILLE HWY 77
4177 EXPRESSWAY 83
BROWNSVILLE, TX - 78520

Return Branch

BROWNSVILLE HWY 77
4177 EXPRESSWAY 83
BROWNSVILLE, TX-78520

Charge Detail

Description	Qty	Period	Rate	Amount
TIME & DISTANCE	1	DAY	60.00	60.00
TIME & DISTANCE	3	HOUR	19.80	59.40
Sub Total				119.40
10% TEXAS MOTOR VEHICLE TAX		PERCENT	10.00	12.24
TEXAS REIMBURSEMENT FEE -DAILY	2	DAY	1.49	2.98
Total Charges (USD)				134.62

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Remit Payment in USD to	For Billing Inquiries	Payment Terms
EAN SERVICES, LLC PO BOX 840173 KANSAS CITY, MO 64184-0173	Tel#:(866) 278-9894 ARINQUIRY@EHI.COM	Payment Due Within 30 days of invoice date. Late payments are subject to finance charge.

Individual line item charges such as rental rates for Time and Distance, percentage-based charges (e.g., sales taxes and fees or surcharges), and charges divided between multiple parties may be rounded up or down a whole cent to ensure that the charges equal the actual Total Amount Due and/or to avoid fractional cents.

* Must be completed by the employee and verified and approved by Branch Manager within fifteen (15) working days after expense was incurred.

Name:	Marinda Van Dalen	Office	Brownsville
Destination	Corpus Christi	File Number	VID0
Purpose of Trip:	Trial		

Departed from: Home Office Time of Departure: Date:
 Returned to: Home Office Time of Return: Date:

Personal Automobile Use				Miles Driven			
Date	9/1/14	From:		To:		Odometer #s	0
Date		Beginning		Ending		Odometer #s	0
Date		From:		To:		Odometer #s	0
Date		Beginning		Ending		Odometer #s	0
Date		From:		To:		Odometer #s	0
Date		Beginning		Ending		Odometer #s	0
Miles are paid at \$0.45				Total Miles		0	
Total Allowance for Personal Automobile Use						\$0.00	

Air Fare
****Receipts required****

DEPARTURE DATE	TIME	FROM	TO	ARRIVAL DATE	TIME
11/11/2019	08:00	DEL	HYD	11/11/2019	10:00
11/11/2019	08:00	DEL	HYD	11/11/2019	10:00
11/11/2019	08:00	DEL	HYD	11/11/2019	10:00
11/11/2019	08:00	DEL	HYD	11/11/2019	10:00
Total Air Fare Expense					
Did TRLA pay airfare in advance, please place an X in the following				YES	NO

Did TRLA pay airfare in advance, please place an X in the following

Meal Allowance:

DATE(S) of Trip	Cost
09/01/14	\$30.00
09/02/14	\$30.00
09/03/14	\$30.00
09/04/14	\$30.00
09/05/14	\$30.00
09/06/14	\$30.00
09/07/14	\$30.00
09/08/14	\$30.00
Total Meal Expenses	\$240.00

Lodging Allowance:
****Receipts required****

DATE(S)	# of Nights		Amt Per Day	Cost
9/1/14	3	Night&Tax	\$282.48	\$877.44
9/4/14	2	Night&Tax	\$226.09	\$450.18
9/7/14	3	Night&Tax	\$125.35	\$378.05
9/8/14	0	Night&Tax	\$0.00	\$0.00
9/9/14	0	Night&Tax	\$0.00	\$0.00
9/10/14	0	Night&Tax	\$0.00	\$0.00
9/11/14	0	Night&Tax	\$0.00	\$0.00
9/12/14	0	Night&Tax	\$0.00	\$0.00
		Total Lodging Expenses		\$1,705.67

Other Expenses:
****Receipts required****

EXPENSES	Date	Cost
Cab Fare		
Car Rental		
Shuttle		
Parking		
Tips & Incidentals	cleaning fee	\$10.00
		\$80.00
(Explain)	gas \$236.89/wines/experts meals \$452.29/phone \$31.53 inter.\$9.95	\$730.66
	Total of Other Expenses	\$830.66

Grand Total \$ 2,774/3.

Amount Claimed: \$	2774.33
ADVANCE RECEIVED: \$	0.00
Advance Check Number: ??	
Advanced Airfare: \$	0.00

Amount Due Traveler: \$ 2,714.30
Amount Due TRLA: \$

I certify that this statement, the attachments and amounts claimed are true, correct and complete and that payment for the amount claimed has not been received.

Employee Signature

Date _____

Primary Supervisor's Signature

Date _____

FOR ACCOUNTING USE ONLY

Account No: _____

Account No: _____

Account No: _____

Account No. _____

* Lodging for Marinda, Robert Doagett, Export and

Name	Marinda Van Dalen	Office	Brownsville
Destination	Corpus Christi	File Number	VID07
Purpose of Trip	TRIP		

Personal Automobile Use			Miles Driven		
Date	From	To	Ending	Odometer #s	0
Date	Beginning	From	To	Odometer #s	0
Date	Beginning	From	To	Odometer #s	0
Date	Beginning	From	To	Odometer #s	0
Date	Beginning	From	To	Odometer #s	0
			Miles are paid at \$0.45		Total Miles
			Total Allowance for Personal Automobile Use		\$0.00

DEPARTURE DATE	TIME	FROM	TO	ARRIVAL DATE	TIME
2023/01/10	08:00	DEL	BOM	2023/01/10	12:00
2023/01/10	08:00	DEL	BOM	2023/01/10	12:00
2023/01/10	08:00	DEL	BOM	2023/01/10	12:00
2023/01/10	08:00	DEL	BOM	2023/01/10	12:00
Total Air Fare Expense					
Did TRLA pay airfare in advance, please place an X in the following				YES	NO

DATE(S) of Trip	Cost
09/09/14	\$30.00
09/10/14	\$30.00
09/11/14	\$30.00
09/12/14	\$30.00
	\$0.00
	\$0.00
	\$0.00
	\$0.00
Total Meal Expenses	\$120.00

DATE(S)	# of Nights	Night&Tax	Amt Per Day	Cost
		Night&Tax		\$0.00
		Night&Tax		\$0.00
		Night&Tax		\$0.00
		Night&Tax		\$0.00
		Night&Tax		\$0.00
		Night&Tax		\$0.00
		Night&Tax		\$0.00
		Night&Tax		\$0.00
		Night&Tax		\$0.00
			Total Lodging Expenses	\$0.00

EXPENSES	Date	Cost
Cab Fare		
Car Rental		
Shuttle		
Parking		
Tips & Incidentals		
(Explain)		
	Total of Other Expenses	\$0.00

Amount Claimed: \$	120.00
ADVANCE RECEIVED: \$	0.00
Advance Check Number:	
Advanced Airfare: \$	0.00

Amount Due Traveler : \$ 120.00
Amount Due TRLA : \$

I certify that this statement, the attachments and amounts claimed are true, correct, and complete and that payment for the amount claimed has not been received.

Date _____

Account No:

✓ Total 14

125.35+
 125.35+
 125.35+
 501.40+
 324.82+
 125.35+
 125.35+
 125.35+
 125.35+
66.59+
 Lodging 1,770.26*

25.06+
 6.47+
31.53*
 phone

9.95+
9.95*
 internet

64.67+
 113.59+
 148.66+
 18.40+
 40.64+
 8.50+
57.83+
 meals 452.29*

57.46+
 24.56+
 76.44+
 18.26+
 30.04+
30.13+
 gps 236.89*

10.00+
10.00*
 parking

0.*

90.00+
90.00*
 cleaning

1,770.26+
 31.53+
 9.95+
 452.29+
 236.89+
 10.00+
 90.00+
 240.00+
120.00+
 2,960.92*

FAI
 OCT 16 2014

12/16/2014

OMNI HOTELS & RESORTS

corpus christi | texas

900 North Shoreline Blvd.

Corpus Christi, TX 78401

Phone: 361-887-1600 • Fax: 361-887-6715

Reservations: 800-843-6664

VANDALEN, MARINDA
 TEXAS RIOGRANDE LEGAL AID
 531 East St. Francis
 Brownsville, TX 78520 US

Room Number: 1625
 Daily Rate: 115.00
 Room Type: DDNB
 No. of Guests: 1 / 0

ARRIVAL	DEPARTURE	CREDIT CARD	RATE PLAN	CATEGORY	ACCOUNT
09/01/14	09/02/14	XXXXXXXXXXXX8272	CBEND	ESP	14501752543

DATE	ROOM NO.	DESCRIPTION	REFERENCE	AMOUNT
09/01/14	1625	LONG DISTANCE	1625/22:04/10/5182816677	\$25.06
09/01/14	1625	ROOM CHARGE	#1625 VANDALEN, MARINDA	\$115.00
09/01/14	1625	CITY OCC TAX - 9%	CITY OCC TAX - 9%	\$10.35
09/02/14	1625	VISA	VISA	(\$150.41)
09/02/14	1625	ADJ - LOCAL CALL	ADJ - LOCAL CALL	(\$25.06)
09/02/14	1625	VISA	CORRECTION	\$25.06

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 OCT 16 2014

Lodging. 115.00+
 10.35+
 125.350

Long Dist. 25.06+
 150.41*

TOTAL DUE: \$0.00

TERMS: DUE AND PAYABLE UPON PRESENTATION. I AGREE THAT MY LIABILITY FOR THIS BILL IS NOT WAIVED AND AGREE TO BE HELD PERSONALLY LIABLE IN THE EVENT THAT THE INDICATED PERSON, COMPANY OR ASSOCIATION FAILS TO PAY FOR ANY PART OR THE FULL AMOUNT OF THESE CHARGES.

11

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 900 North Shoreline Blvd.
 Corpus Christi, TX 78401
 Phone: 361-887-1600 • Fax: 361-887-6715
 Reservations: 800-843-6664

VANDALEN, MARINDA

531 East St. Francis
 Brownsville, TX 78520 US

Room Number: 1042

Daily Rate: 115.00

Room Type: DDNB

No. of Guests: 1 / 0

ARRIVAL	DEPARTURE	CREDIT CARD	RATE PLAN	CATEGORY	ACCOUNT
09/03/14	09/04/14	XXXXXXXXXXXX8272	CBEND	ESP	14501783839

DATE	ROOM NO.	DESCRIPTION	REFERENCE	AMOUNT
09/03/14	1042	WIFI INTERNET ACCESS	1042/1/15:25/WIFI INTERNET ACCESS	\$9.95
09/03/14	1042	TOPSIDER LOUNGE	1042/3306/20:18/TOPSIDER LOUNGE	\$64.67
09/03/14	1042	ROOM CHARGE	#1042 VANDALEN, MARINDA	\$115.00
09/03/14	1042	CITY OCC TAX - 9%	CITY OCC TAX - 9%	\$10.35
09/04/14	1042	VISA	VISA	(206.87)
09/06/14	1042	VISA	CV....8272 CREDIT	\$6.90

PAID
 OCT 16 2014

0.*
 Lodging. 115.00+
 10.35+
 125.35*
 Internet 9.95+
 9.95*
 web. 64.67+
 64.67*

CREDIT DUE: (\$0.00)

TERMS: DUE AND PAYABLE UPON PRESENTATION. I AGREE THAT MY LIABILITY FOR THIS BILL IS NOT WAIVED AND AGREE TO BE HELD PERSONALLY LIABLE IN THE EVENT THAT THE INDICATED PERSON, COMPANY OR ASSOCIATION FAILS TO PAY FOR ANY PART OR THE FULL AMOUNT OF THESE CHARGES.

W8

OMNI HOTELS & RESORTS

corpus christi | texas

900 North Shoreline Blvd.

Corpus Christi, TX 78401

Phone: 361-887-1600 • Fax: 361-887-6715

Reservations: 800-843-6664

VANDALEN, MARINDA
 TEXAS RIOGRANDE LEGAL AID
 300 S TEXAS BLVD
 WESLACO, TX 78520 US

Room Number: 656

Daily Rate: 115.00

Room Type: DDNB

No. of Guests: 1 / 0

ARRIVAL	DEPARTURE	CREDIT CARD	RATE PLAN	CATEGORY	ACCOUNT
09/03/14	09/05/14	XXXXXXXXXXXX8272	BAR7	BAR7	14501784933

DATE	ROOM NO.	DESCRIPTION	REFERENCE	AMOUNT
09/04/14	656	ROOM CHARGE	#656 VANDALEN, MARINDA	\$115.00
09/04/14	656	CITY OCC TAX - 9%	CITY OCC TAX - 9%	\$10.35
09/05/14	656	VISA	VISA	(\$132.25)
09/06/14	656	VISA	CV.....8272 CREDIT	\$6.90

12535

115.00+
 10.35+
 Lodging. 125.35*

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 OCT 16 2014

CREDIT DUE: (\$0.00)

TERMS: DUE AND PAYABLE UPON PRESENTATION. I AGREE THAT MY LIABILITY FOR THIS BILL IS NOT WAIVED AND AGREE TO BE HELD PERSONALLY LIABLE IN THE EVENT THAT THE INDICATED PERSON, COMPANY OR ASSOCIATION FAILS TO PAY FOR ANY PART OR THE FULL AMOUNT OF THESE CHARGES.

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OMNI HOTELS & RESORTS

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900 North Shoreline Blvd.

Corpus Christi, TX 78401

Phone: 361-887-1600 • Fax: 361-887-6715

Reservations: 800-843-6664

VANDALEN, MARINDA
TEXAS RIOGRANDE LEGAL AID
531 East St. Francis
Brownsville, TX 78520 US

Room Number: 1044
Daily Rate: 115.00
Room Type: DDNB
No. of Guests: 1 / 0

ARRIVAL	DEPARTURE	CREDIT CARD	RATE PLAN	CATEGORY	ACCOUNT
09/01/14	09/05/14	XXXXXXXXXXXX8272	CBEND	ESP	14501752544

DATE	ROOM NO.	DESCRIPTION	REFERENCE	AMOUNT
09/01/14	1044	TOPSIDER LOUNGE	1044/3201/21:46/TOPSIDER LOUNGE	\$41.66
09/01/14	1044	ROOM CHARGE	#1044 VANDALEN, MARINDA	\$115.00
09/01/14	1044	CITY OCC TAX - 9%	CITY OCC TAX - 9%	\$10.35
09/02/14	1044	TOPSIDER LOUNGE	1044/3256/23:34/TOPSIDER LOUNGE	\$33.54
09/02/14	1044	ROOM CHARGE	#1044 VANDALEN, MARINDA	\$115.00
09/02/14	1044	CITY OCC TAX - 9%	CITY OCC TAX - 9%	\$10.35
09/03/14	1044	TOPSIDER LOUNGE	1044/3274/13:12/TOPSIDER LOUNGE	\$38.39
09/03/14	1044	ROOM CHARGE	#1044 VANDALEN, MARINDA	\$115.00
09/03/14	1044	CITY OCC TAX - 9%	CITY OCC TAX - 9%	\$10.35
09/04/14	1044	ROOM CHARGE	#1044 VANDALEN, MARINDA	\$115.00
09/04/14	1044	CITY OCC TAX - 9%	CITY OCC TAX - 9%	\$10.35
09/05/14	1044	VISA	VISA	(\$642.59)
09/06/14	1044	VISA	CV....8272 CREDIT	\$27.60

614.99

FAIR
OCT 16 2014

0.*

Lodgers

125.35+
125.35+
125.35+
125.35+
501.40*

Lodg.

41.66+
33.54+
38.39+
113.59*

CREDIT DUE: (\$0.00)

TERMS: DUE AND PAY
BILL IS NOT WAIVED AN
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THAT MY LIABILITY FOR THIS
BLE IN THE EVENT THAT THE
' FOR ANY PART OR THE FULL

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OMNI HOTELS & RESORTS

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900 North Shoreline Blvd.

Corpus Christi, TX 78401

Phone: 361-887-1600 • Fax: 361-887-6715

Reservations: 800-843-6664

VANDALEN, MARINDA

Room Number: 1042

Daily Rate: 149.00

Room Type: DDNB

No. of Guests: 1 / 0

US

ARRIVAL	DEPARTURE	CREDIT CARD	RATE PLAN	CATEGORY	ACCOUNT
09/04/14	09/06/14	XXXXXXXXXXXX8272	BAR7	BAR7	14501784924

DATE	ROOM NO.	DESCRIPTION	REFERENCE	AMOUNT
09/04/14	1042	ROOM CHARGE	#1042 VANDALEN, MARINDA	\$149.00
09/04/14	1042	CITY OCC TAX - 9%	CITY OCC TAX - 9%	\$13.41
09/05/14	1042	MORSELS, BAYFRONT TOWER	1042/8977/07:20/MORSELS, BAYFRONT TOWER	\$3.25
09/05/14	1042	GLASS PAVILION RESTAURANT	1042/6769/13:08/GLASS PAVILION RESTAURANT	\$134.75
09/05/14	1042	TOPSIDER LOUNGE	1042/3452/22:01/TOPSIDER LOUNGE	\$10.66
09/05/14	1042	ROOM CHARGE	#1042 VANDALEN, MARINDA	\$149.00
09/05/14	1042	CITY OCC TAX - 9%	CITY OCC TAX - 9%	\$13.41
09/06/14	1042	VISA	VISA	(\$501.31)
09/06/14	1042	ADJ - INDIVIDUAL ROOM CHARGE	ADJ - INDIVIDUAL ROOM CHARGE	(\$59.13)
09/06/14	1042	ADJ - CITY TAX - 9%	ADJ - CITY TAX - 9%	(\$5.32)
09/06/14	1042	ADJ - STATE OCC TAX 6.0%	ADJ - STATE OCC TAX 6.0%	(\$3.55)
09/06/14	1042	VISA	CV....8272 CREDIT	\$77.95
09/06/14	1042	VISA	CV....8272 CREDIT	\$17.88

473.48


 OCT 16 2014

 meals
 3.25+
 134.75+
 10.66+
 148.66*

 Lodging
 149.00+
 149.00+
 13.41+
 13.41+
 324.82*
TOTAL DUE: \$0.00

TERMS: DUE AND PAYABLE UPON PRESENTATION. I AGREE THAT MY LIABILITY FOR THIS BILL IS NOT WAIVED AND AGREE TO BE HELD PERSONALLY LIABLE IN THE EVENT THAT THE INDICATED PERSON, COMPANY OR ASSOCIATION FAILS TO PAY FOR ANY PART OR THE FULL AMOUNT OF THESE CHARGES.

*Estrada***OMNI HOTELS & RESORTS**

corpus christi | texas

900 North Shoreline Blvd.

Corpus Christi, TX 78401

Phone: 361-887-1600 • Fax: 361-887-6715

Reservations: 800-843-6664

ESTRADA, LIONEL
 TEXAS RIOGRANDE LEGAL AID
 300 S. TEXAS BLVD
 WESLACO, TX 78520 US

Room Number: 1029
 Daily Rate: 115.00
 Room Type: DDNB
 No. of Guests: 1 / 0

ARRIVAL	DEPARTURE	CREDIT CARD	RATE PLAN	CATEGORY	ACCOUNT
09/03/14	09/04/14	XXXXXXXXXXXX8272	BAR7	BAR7	14501784923

DATE	ROOM NO.	DESCRIPTION	REFERENCE	AMOUNT
09/03/14	1029	ROOM CHARGE	#1029 ESTRADA, LIONEL	\$115.00
09/03/14	1029	CITY OCC TAX - 9%	CITY OCC TAX - 9%	\$10.35
09/04/14	1029	VISA	VISA	(\$132.25)
09/04/14	1029	GLASS PAVILION RESTAURANT	1029/6633/07:36/GLASS PAVILION RESTAURAN	\$18.40
09/04/14	1029	LONG DISTANCE	1029/08:22/1/5126803831	\$6.47
09/04/14	1029	VISA	CV....8272	(\$24.87)
09/06/14	1029	VISA	CV....8272 CREDIT	\$6.90

pd. 150.22

Lodging 115.00+
 10.35+
 125.35*

Meal 18.40+
 18.40*

Long Distance 6.47+
 6.47*

PAID
 OCT 16 2014

CREDIT DUE: (\$0.00)

TERMS: DUE AND PAYABLE UPON PRESENTATION. I AGREE THAT MY LIABILITY FOR THIS BILL IS NOT WAIVED AND AGREE TO BE HELD PERSONALLY LIABLE IN THE EVENT THAT THE INDICATED PERSON, COMPANY OR ASSOCIATION FAILS TO PAY FOR ANY PART OR THE FULL AMOUNT OF THESE CHARGES.

#6

OMNI HOTELS & RESORTS

corpus christi | texas

900 North Shoreline Blvd.

Corpus Christi, TX 78401

Phone: 361-887-1600 • Fax: 361-887-6715

Reservations: 800-843-6664

VANDALEN, MARINDA
TEXAS RIOGRANDE LEGAL AID
531 East St. Francis
Brownsville, TX 78520 US

Room Number: 1452

Daily Rate: 115.00

Room Type: DDNB

No. of Guests: 1 / 0

ARRIVAL	DÉPARTURE	CREDIT CARD	RATE PLAN	CATEGORY	ACCOUNT
09/07/14	09/08/14	XXXXXXXXXXXX8272	CBEND	ESP	14501752541

DATE	ROOM NO.	DESCRIPTION	REFERENCE	AMOUNT
09/07/14	1452	ROOM CHARGE	#1452 VANDALEN, MARINDA	\$115.00
09/07/14	1452	CITY OCC TAX - 9%	CITY OCC TAX - 9%	\$10.35
09/08/14	1452	VISA	VISA	(\$132.25)
09/08/14	1452	VISA	CV...8272 CREDIT	\$6.90

DS.35

115.00+

10.35+

125.35*

PAID
OCT 16 2014

CREDIT DUE: (\$0.00)

TERMS: DUE AND PAYABLE UPON PRESENTATION. I AGREE THAT MY LIABILITY FOR THIS BILL IS NOT WAIVED AND AGREE TO BE HELD PERSONALLY LIABLE IN THE EVENT THAT THE INDICATED PERSON, COMPANY OR ASSOCIATION FAILS TO PAY FOR ANY PART OR THE FULL AMOUNT OF THESE CHARGES.

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OMNI HOTELS & RESORTS

corpus christi | texas

900 North Shoreline Blvd.

Corpus Christi, TX 78401

Phone: 361-887-1600 • Fax: 361-887-6715

Reservations: 800-843-6664

VAN DALEN, MARINDA

531 East St. Francis
Brownsville, TX 78520 US

Room Number: 1454

Daily Rate: 115.00

Room Type: DDNB

No. of Guests: 1 / 0

ARRIVAL	DEPARTURE	CREDIT CARD	RATE PLAN	CATEGORY	ACCOUNT
09/07/14	09/08/14	XXXXXXXXXXXX8272	CBEND	ESP	14501783841

DATE	ROOM NO.	DESCRIPTION	REFERENCE	AMOUNT
09/07/14	1454	ROOM CHARGE	#1454 VAN DALEN, MARINDA	\$115.00
09/07/14	1454	CITY OCC TAX - 9%	CITY OCC TAX - 9%	\$10.35
09/08/14	1454	VISA	VISA	(\$132.25)
09/08/14	1454	TOPSIDER LOUNGE	1454/3575/15:28/TOPSIDER LOUNGE	\$40.64 -
09/08/14	1454	VISA	VISA...8272	(\$40.64) -
09/08/14	1454	VISA	CV...8272 CREDIT	\$6.90

VAN DALEN, MARINDA

531 East St. Francis
Brownsville, TX 78520

115.00+

Lodgers


10.35+

125.35*

Meal.

40.64+

40.64*


 OCT 16 2014

CREDIT DUE: (\$0.00)

TERMS: DUE AND PAYABLE UPON PRESENTATION. I AGREE THAT MY LIABILITY FOR THIS BILL IS NOT WAIVED AND AGREE TO BE HELD PERSONALLY LIABLE IN THE EVENT THAT THE INDICATED PERSON, COMPANY OR ASSOCIATION FAILS TO PAY FOR ANY PART OR THE FULL AMOUNT OF THESE CHARGES.

x7

OMNI HOTELS & RESORTS

corpus christi | texas

900 North Shoreline Blvd.

Corpus Christi, TX 78401

Phone: 361-887-1600 • Fax: 361-887-6715

Reservations: 800-843-6664

VANDALEN, MARINDA
 COASTAL BEND LAW FIRMS
 531 East St. Francis
 Brownsville, TX 78520 US

Room Number: 1456

Daily Rate: 115.00

Room Type: DDNB

No. of Guests: 1 / 0

ARRIVAL	DEPARTURE	CREDIT CARD	RATE PLAN	CATEGORY	ACCOUNT
09/07/14	09/08/14	XXXXXXXXXXXX8272	CBEND	ESP	14501785625

DATE	ROOM NO.	DESCRIPTION	REFERENCE	AMOUNT
09/07/14	1456	ROOM CHARGE	#1456 VANDALEN, MARINDA	\$115.00
09/07/14	1456	CITY OCC TAX - 9%	CITY OCC TAX - 9%	\$10.35
09/08/14	1456	VISA	VISA	(\$132.25)
09/08/14	1456	VISA	CV. 8272 CREDIT	\$6.90

125.35

Lodging 115.00+
 10.35+
 125.35*

PAID
 OCT 16 2014

CREDIT DUE: (\$0.00)

TERMS: DUE AND PAYABLE UPON PRESENTATION. I AGREE THAT MY LIABILITY FOR THIS BILL IS NOT WAIVED AND AGREE TO BE HELD PERSONALLY LIABLE IN THE EVENT THAT THE INDICATED PERSON, COMPANY OR ASSOCIATION FAILS TO PAY FOR ANY PART OR THE FULL AMOUNT OF THESE CHARGES.

AMERICAN BEST VALUE INN - RAYMONDVILLE
 450 S. EXPRESSWAY 77 / I-69
 RAYMONDVILLE, TX 78580
 TOLL FREE RESERVATION # 1-888-315-BEST (2378)
 PHONE & FAX # 956-689-5900 WWW.americasbvi.com
 ABVIS-RAYMONDVILLE@HOTMAIL.COM
 Printed: 9/2/2014 - 8:59pm

MARINDA O VANDALEN Guest #25: 055384
 207 E WASHINGTON ST
 BROWNSVILLE TX 78520

Room: 105 2 BED KIC NON SMO
 Daily Rate: 59.99 + Tax
 Check-in: 09/02/14 8:59pm Out: 09/03/14 Nights: 1 Guests: 1/0

CHARGES						PAYMENT				
Date	Room	Phone	Misc.	Tax	Total	Credit	Cash	Bill	Total	Balance
9/2/14	59.99	0.00	0.00	0.60	66.59	66.59	0.00	0.00	66.59	0.00

(Taxes - CITY : \$3.00, STATE: \$3.60)

AMOUNT TENDERED : \$0.00
 CHANGE : \$0.00

Check-out time: 11:00am Check-in time: 4:00pm

Guest Signature: _____

PAID
 OCT 16 2014

THE MANAGEMENT ASSUMES NO RESPONSIBILITY FOR ACCIDENTS, INJURIES, THEFT OR LOSS DUE TO ANY CAUSE.
 THANK YOU FOR STAYING HERE WE HOPE YOU HAVE ENJOYED YOUR STAY. PLEASE CALL AGAIN ANY TIME TO
 MAKE RESERVATIONS HERE.

90/9

VID07-0

12/5/17

Miles are paid at \$0.53	Total Miles	0
Total Allowance for Personal Automobile Use		\$0.00

Total Air Fare Expense	\$146.99
------------------------	----------

NO X

Total Meal Expenses	\$90.00
---------------------	---------

Total Lodging Expenses	\$88.60
------------------------	---------

Total of Other Expenses	\$96.00
-------------------------	---------

JAN - 5 2018

12/2/79

Date _____

Account No:

JAN - 5 2018

[illegible]

```

EXIT TIME: 12/04/17 10:22
EXIT TIME: 12/05/17 16:34
PARK-DUR.: D:HRS:M 1:06:12

```

AMOUNT: \$ 24.22
KIND OF PAYMENT:
AMEX
XXXXXXXXXXXX0002
201
VISIT
SAT Park

FOR CREDIT: 300 HOURS
 1980-81
 1981-82
 1982-83
 1983-84

Received 10 July 1997

ISSUED BY AND VALID ONLY ON
SOUTHWEST AIRLINES

TICKET : 5268786465634

Base Fare	Fees	Taxes	Totals
110.29	36.67		146.96

TICKET TOTAL 110.29 36.67 146
(WANNA GET AW.

AX XXXXXXXXXXXX3002 \$146.96 AX XXXXXXXXXXXX3002 \$146.96
FP AX AUTH: 288484 \$146.96 AX AUTH: 288484 \$146.96

You're all set.

Your card has been charged, and a confirmation email is on its way.

La Quinta Inn & Suites New Orleans Downtown

📍 301 Camp Street, New Orleans, LA 70130

Guest Name Jose Garza

Check-in Monday, December 4, 2017

Check-out Tuesday, December 5, 2017

This booking will be 100% refundable if cancelled before 11:59pm local time December 2. After this time, the booking is completely non-refundable and cannot be changed or cancelled.

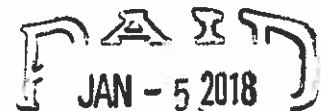
Your Booking Number WC7Q3W6

Total Points Earned 76 500 Earned
Posted after check-out Rapid Rewards® points

Total Paid \$88.60 USD
AMEX ending in 3002

Your Download Your Receipt (PDF) (/receipt/WC7Q3W6
Receipt /caf1f75df9ef81d9b21a4f521b9090f5b86ebdbd)

Add to Calendar Add This Trip To Your Calendar



Taylor Exhibit G

Other Trial Expenses (Interpreter)

TEXAS RIOGRANDE LEGAL AID, INC.
300 S. TEXAS BLVD. (956) 447-4800 383-0641
WESLACO, TEXAS 78596

INTER NATION BANK
Weslaco

96335

NON AVAILABLE

9/30/2014

PAY TO THE ORDER OF CARMEN M. MACOSSAY

\$ *****175.00

One Hundred Seventy-Five & 00/100 Dollars

DOLLARS

TEXAS RIOGRANDE LEGAL AID, INC.
VOID AFTER 90 DAYS

~~NON-NEGOTIABLE~~

MEMO

V ⑈096335⑈ ⑆114915272⑆ ⑈00 0907 5⑈ V

TEXAS RIOGRANDE LEGAL AID, INC.

96335

M0151 MACOSSAY, CARMEN M.

CK/Dep# 96335

9/30/2014

\$ *****175.00

V  SEP 30 2014 V

NON-NEGOTIABLE

TEXAS RIOGRANDE LEGAL AID, INC.

96335

V MACOSSAY, CARMEN M. (M0151)
SI SI TRANSLATIONS
309 WILLIAMSON PLACE
CORPUS CHRISTI, TX 78411-1515 V

NON-NEGOTIABLE

Carmen M. "Millie" Macossay*
309 Williamson Place
Corpus Christi TX 78411-1515

Phone: 361-854-5393
E-mail: sisitranslations@gmail.com

Mobile Phone: 361-549-6511

INVOICE

September 26, 2014

Via email: MVanDalen@trla.org
Atopete@trla.org

For Professional Services Rendered

Ms. Marinda van Dalen
TEXAS RIO GRANDE LEGAL AID, INC.
531 East St. Francis Street
Brownsville, TX 78520



<u>DATE</u>	<u>DESCRIPTION</u>
09/2014	Interpret Trial Testimony of Mr. Eulalio Mendez, Jr. in Cause No. 2:13-CV-193 & Consolidated cases, <i>Belinda Ortiz et al. vs. State of Texas et al.</i> , in the Corpus Christi Division of the United States District Court. Travel time portal-to-portal, review of operative pleadings & mileage. (2-hour minimum).

Invoice Total		\$206.00
	Courtesy discount 15%	<u>\$ 31.00</u>
	Total Due	\$175.

****Payment terms: Due upon receipt. PLEASE MAKE CHECK PAYABLE TO CARMEN M. MACOSSAY.**

Ms. Marinda (& Ms. Anna & Mr. Doggett), thank you for the opportunity to serve you! To insure proper credit, please enclose a copy of this invoice with your remittance.

**Federally Certified Spanish Court Interpreter--Certification No. 98-067.*